

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

WANDA DAUMONT COLÓN

Plaintiff

V.

COOPERATIVA DE AHORRO Y
CRÉDITO DE CAGUAS

Defendant

CIVIL NO.: 15-3120

AGE DISCRIMINATION

TAKING OF DEPOSITION OF MRS. WANDA DAUMONT-COLÓN

DATE : January 19th, 2017

TIME : 2:30 p.m.

OFFICE : MENDOZA LAW OFFICES

ADDRESS : Centro de Seguros Building, Suite 312
701 Ponce de Leon Avenue
San Juan, Puerto Rico

APPEARANCES

ON BEHALF OF PLAINTIFF:

Erickson Sánchez-Preks, Esq.

ON BEHALF OF DEFENDANT:

Enrique J. Mendoza-Méndez, Esq.
Otto Muller, Esq.

NOTARY PUBLIC:

Otto Muller, Esq.


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COPY

1 Daumont in this deposition?

2 A Yes.

3 Q Very well. I did not mention when I gave some
4 preliminary matters concerning this deposition off the
5 record to you with your counsel, that if at any point in
6 time you need to stop, to take care of a telephone call or
7 go to the service room, or have some water, you are
8 allowed and free to do so, and we'll accommodate you.

9 MR. SÁNCHEZ:

10 You understand the explanation?

11 DEPONENT:

12 Yes.

13 MR. SÁNCHEZ:

14 Okay. Remember to answer verbally, all your answers.

15 DEPONENT:

16 Yes.

17 MR. MENDOZA:

18 Q Okay. Very good. I will take you now to February
19 20th of the year 2015. In that day, you made a transaction
20 at one of the branches of Caguas Coop, concerning the
21 account of Mr. José Tirado. Correct?

22 DEPONENT:

23 A Could you clarify? Because I personally, did not
24 carry out the transaction.

25 Q Very well. You remember that day, that specific

1 day, and what happened?

2 A Yes. Correct.

3 Q Okay.

4 MR. SÁNCHEZ:

5 For the record, attorney Erickson Sánchez. Just to
6 clarify your question. When you said "what happened",
7 you're referring to the event regarding the transaction
8 you made referenced in the prior question?

9 MR. MENDOZA:

10 Q Okay. When you say "yes", that you remember what
11 happened, you were meaning to a transaction related to the
12 account of José Tirado?

13 DEPONENT:

14 A Yes.

15 Q Okay. This is what I need from you now. I want
16 you to tell me what happened, concerning that transaction,
17 and try to do it in order, how it happened. Please.

18 A My husband called me to the office, because he
19 has a line of credit and I am personally authorized,
20 because it is his account. He needed to withdraw eighty
21 dollars, from the line of credit to be transferred to his
22 checking account.

23 I went ahead and prepared the document and the
24 deposit for the account, the checking account, and I went
25 to the teller area, where these types of transactions are

1 conducted. When I gave the sheets to the teller, I told
2 him had to get the signature of the authorized person in
3 that area... in charge of that area. Later I went to my
4 office.

5 Q Anything else?

6 A No. That is all.

7 Q At that point in time, what was the position you
8 held at Caguas Coop?

9 A Branch Manager.

10 Q Of which branch?

11 A The central branch, that is located at Gautier
12 Benítez Avenue, in Caguas.

13 Q And the transaction was done or took effect at
14 the branch, in which you were the manager?

15 A Yes.

16 Q And the documents of the transaction, you
17 tendered them to whom?

18 A To the teller, Mr. Norberto Santos.

19 Q To whom does Mr. Santos reported in that point
20 in time?

21 A He could have reported to the supervisor of the
22 teller area.

23 Q Who was him or her?

24 A At that time, it was Ms. Joany Torres, yes.

25 Q To whom did Ms. Torres reported to?

1 A Ms. Torres reported to me.

2 Q Do you remember what day of the week, was
3 February 20th, 2015?

4 A Could you please repeat the question?

5 Q Yes. Do you remember what day of the week, or
6 more specifically, do you remember whether it was or not
7 a Saturday?

8 A No, it was not a Saturday.

9 Q Do you remember what day it was?

10 A Like Friday.

11 MR. MENDOZA:

12 Okay. Lets go off the record for a minute, to clarify
13 that and have the exact day of the week, because it is
14 important for us now.

15 MR. SÁNCHEZ:

16 No problem.

17 OFF THE RECORD

18 MR. MENDOZA:

19 Off the record, everybody here made efforts one way
20 or the other to pinpoint, and we have come to the
21 conclusion that it was a Friday. Correct, brother counsel?

22 MR. SÁNCHEZ:

23 That's correct.

24 MR. MENDOZA:

25 Q Okay. So it was a Friday. Correct?

1 DEPONENT:

2 A Correct.

3 Q Do you have any recollection as to whether Mrs.
4 Joany Torres was present, or not, in the branch that day?

5 A At the branch? Yes.

6 Q And was she present all day?

7 A Correct.

8 Q So, if I ask you whether she was out on a leave
9 or not, your answer would be "No, she was not on a leave,
10 she was present at work".

11 A She was at work.

12 Q Did you, Mrs. Daumont, ask Mrs. Joany Torres, to
13 authorize the transaction on that February 20th, 2015? Yes
14 or no?

15 A No.

16 Q Aside from Mrs. Joany Torres, who could... who
17 has the authority, also, to authorize that transaction?

18 A Mr. Ramón Adorno.

19 Q What was his position at that time?

20 A VP of Operations.

21 Q Did you ask him for authorization for that
22 transaction, on February 20th, 2015?

23 A No.

24 Q Who else, if anybody else, could have authorized
25 such a transaction?

1 A Mrs. Jonanny Torres.

2 Q Okay. We already know that. And we know that
3 Joany Torres, as per your testimony, had the faculty of
4 authorizing that transaction. Correct?

5 A Yes.

6 Q And also, Mr. Adorno has that authorization.

7 A Yes.

8 Q Anybody else, aside from Mrs. Torres and Mr.
9 Adorno, has that authorization, has that faculty to
10 provide such authorization?

11 A Well, at that branch it could be the Credit Vice
12 President, Mrs. Wilma Rivera.

13 Q Was Mrs. Wilma Rivera present on February 20th,
14 2015?

15 A Correct.

16 Q Did you ask her for such authorization?

17 A No.

18 Q Was Mr. Adorno present in his job on February
19 20th, 2015?

20 A Could you please repeat the question, so I may
21 explain, if you allow me?

22 Q What did you... did not understand from my
23 question? I will clarify.

24 A "Usted dijo que si el Sr. Adorno se
25 encontraba... fue a traba... estaba trabajando ese día".

1 Q Correct, I asked you that.

2 A Yes. He was working on that day.

3 Q Did you ask him to authorize the transaction of
4 Mr. Tirado?

5 MR. SÁNCHEZ:

6 Objection. Repetitive. Already answered.

7 DEPONENT:

8 No.

9 MR. MENDOZA:

10 Q When you mentioned that Mr. José Tirado is your
11 husband, the fact is that you are not married. Correct?

12 DEPONENT:

13 A Legally not.

14 Q But you have a consensual relationship, as if
15 you were married.

16 A Correct.

17 Q Since when, more or less?

18 A Since, more or less, 1999.

19 Q Okay. The documents for the transaction that you
20 handed to Mr. Norberto Santos, you prepared them yourself.

21 A Correct.

22 Q With your own handwriting.

23 A Correct.

24 MR. MENDOZA:

25 Vamos fuera de récord un momentito.

1 OFF THE RECORD

2 MR. MENDOZA:

3 Lets mark the following document as Exhibit 1 of this
4 deposition, please.

5 Off the record, in conversation with brother counsel
6 Sánchez, we edited the documents so it only portrayed the
7 last four digits of the social security number of the
8 concerned party. Very well.

9 Q Can you explain what this document is?

10 DEPONENT:

11 A That document is the paper that is used for
12 withdrawals from the line of credit.

13 Q And the owner of the line of credit, who is he
14 or she?

15 A Mr. José A. Tirado.

16 Q And you already told us that you filled out this
17 form with your handwriting.

18 A Correct.

19 Q And what it says the signature of the member,
20 meaning the member of the Cooperative or Credit Union, it
21 said José A. Tirado, but it was you who signed it.

22 MR. SÁNCHEZ:

23 Incorrect. I think that that was not the question.

24 MR. MENDOZA:

25 I'll make the question again. I'll make the question

1 again, so we don't have problems with this.

2 Q I'm going to take you where the document said
3 "signature of the member". What does it says?

4 DEPONENT:

5 A Excuse me. I do not understand the question.

6 Q Please look where it says, "signature of the
7 member".

8 A Correct.

9 Q And it is signed.

10 A It is signed.

11 Q What name does it say there?

12 A Jose A. Tirado.

13 Q And who signed that name in that document?

14 A I did.

15 Q Okay. Thank you. When a member of Caguas Coop
16 has a line of credit, what he has to do to open it and to
17 have it authorized?

18 MR. SÁNCHEZ:

19 I think question began "to open it".

20 MR. MENDOZA:

21 Yes. I'll make the question again. No problem.

22 Q In order to open up a line of credit, what does
23 a member have to do?

24 DEPONENT:

25 A To get a line of credit?

1 A The requirements? Be a member of the credit
2 union, your ability to pay, your credit references, and
3 that it be approved by the Credit Committee.

4 Q And your testimony is that Mr. José Tirado,
5 satisfied all those requirements.

6 MR. SÁNCHEZ:

7 Objection to the question, apparently this is
8 incorrect, since she was not answering, that Mr. José
9 Tirado is particularly had those requirements. He was
10 answering what were the requirements to obtain a line of
11 credit.

12 MR. MENDOZA:

13 Q Did Mr. Tirado fail to satisfy any of the
14 requirements that you mentioned to obtain a line of
15 credit?

16 DEPONENT:

17 A I do not know. Because when I started with Mr.
18 José Tirado, he already had his line of credit.

19 Q Was that line of credit ever modified, after you
20 started your relationship with Mr. Tirado?

21 MR. SÁNCHEZ:

22 Objection to the question. What do you mean by the
23 line of credit? You mean the requirements or other things?
24 Clarify that.

25

1 MR. MENDOZA:

2 That's a speaking objection. I'll make another
3 question. But please don't make speaking objections.

4 MR. SÁNCHEZ:

5 I'm trying to clarify the question, because...

6 MR. MNDOZA:

7 But that's not the way to clarify. You have an
8 objection to the question, it's not clear, we deal with
9 it.

10 MR. SÁNCHEZ:

11 Okay.

12 MR. MENDOZA:

13 But that's a speaking objection.

14 MR. SÁNCHEZ:

15 Okay. "Perfecto".

16 MR. MENDOZA:

17 Q After you started your relationship with Mr.
18 Tirado, did you go with him to Caguas Coop to modify in
19 any way the line of credit he already had?

20 DEPONENT:

21 A The line of credit? No, I don't know, no. If it
22 was modified.

23 Q But that's not my question. My question is
24 whether you went with him to modify it.

25 A No.

1 Q Did at any point in time, after you started your
2 relationship with Mr. Tirado, did you sign documents at
3 Caguas Coop, in order to be a party responsible for the
4 line of credit?

5 A No.

6 Q How were you authorized to make withdrawals from
7 Mr. José Tirado's line of credit with Caguas Coop?

8 A Excuse me. Could you please repeat the question?

9 Q How was you authorized to make withdrawals from
10 Mr. Tirado's line of credit with Caguas Coop?

11 A Because he authorized me. He called me to
12 authorize me. In fact, he even went to the credit union to
13 authorize me.

14 Q I'm talking now specifically about the line of
15 credit. When was it that he authorized you, to make
16 withdrawals from his line of credit?

17 A Me, because he called me, a transfer that would
18 be done to his checking account, his account.

19 Q How did Mr. José Tirado authorize you before
20 Caguas Coop, not to you in the forms, before Caguas Coop
21 to make withdrawals from his line of credit?

22 A I do not understand the question.

23 Q You already told us, when I asked you how you
24 were authorized to make withdrawals from Mr. Tirado's line
25 of credit, you told us that Mr. Tirado called you and

1 authorized you to do so. Correct?

2 A Correct.

3 Q That's not what I'm asking now. What I'm asking
4 now is, how Mr. Tirado, before Caguas Coop, informed them
5 that you were authorized to make withdrawals from his line
6 of credit?

7 A Well, because that line of credit, was his. That
8 line of credit had money that had already been approved
9 that was his.

10 Q So the fact is that Mr. José Tirado never went
11 to Caguas Coop to inform them and document that you were
12 authorized to make withdrawals from his line of credit.
13 Correct?

14 A No, because I was already authorized in the
15 account.

16 Q So, to have this clear. You're saying that you
17 have authorization to make transaction of his account, but
18 you're telling me that you did not have authorization to
19 make transaction from his line of credit. Is that your
20 testimony?

21 A No.

22 Q Are you authorized to make withdrawals from his
23 line of credit, yes or no?

24 A Authorized by him.

25 Q But Mr. José Tirado never went to Caguas Coop to

1 convey to them that you were so authorized.

2 A No.

3 MR. MENDOZA:

4 Okay. Vamos fuera de récord un momento.

5 OFF THE RECORD

6 MR. MENDOZA:

7 We are handing to the deponent, and we did so already
8 off the record to brother counsel for examination and for
9 the deponent, what have to mark as Exhibit 2 and Exhibit
10 2A, concerns some documents from Mr. José A. Tirado
11 Meléndez's account. And we edited them for protection, his
12 social security number and the number of the account.
13 Brother counsel Sánchez requested that we produce the
14 originals without editing, he may consult with Mr. Tirado,
15 in order to do his due diligence, concerning this
16 document.

17 We went off the record. He did so verify them with
18 Mr. Tirado. Correct Mr. Sánchez?

19 MR. SÁNCHEZ:

20 That is correct.

21 MR. MENDOZA:

22 Q Okay. Very well. Mrs. Daumont, would you please,
23 you already examined this document. Correct?

24 DEPONENT:

25 A Correct.

1 Caguas Coop?

2 A Under [REDACTED], that was the account, the checking
3 account. That is the question? He had checking account.

4 Q Anything else but checking account?

5 A Savings account, he also had. If I recall
6 correctly, mortgage loan and a line of credit.

7 Q So, and your testimony is that the documents
8 that were prepared to register yourself as an authorized
9 person in Mr. Tirado's account on February 28th, 2015, was
10 to update what Caguas Coop already had. That's your
11 testimony?

12 A Correct.

13 Q I'm going to show you Exhibit 2A, and ask you
14 whether it states that that authorization is for the
15 savings account. Correct? Yes or no?

16 MR. SÁNCHEZ:

17 Do you have another copy? Just to check it at the
18 same time.

19 MR. MENDOZA:

20 Q "Sí. Tengo la que no está editada".

21 DEPONENT:

22 A Correct.

23 Q Okay. Thank you. You did not sign, you and Mr.
24 Tirado, an authorization to do transaction in the checking
25 account. Yes or no?

1 A Please, repeat the question.

2 Q You did not, and Mr. Tirado neither, sign up to
3 authorize you to do transaction in the checking account.
4 Yes or no? Please, answer yes or no. I need no
5 explanation.

6 A No.

7 Q Your answer is no.

8 A No, with an explanation.

9 Q Okay. And there is not an authorization, signed
10 by you and Mr. Tirado, to do transactions in the credit
11 line. Yes or no?

12 A No, with an explanation.

13 Q Okay. So Exhibit 2 and Exhibit A were the only
14 documents that you and Mr. Tirado signed with Caguas Coop
15 on February 28th, 2015 to update the information, that as
16 per your testimony, Caguas Coop already had.

17 A Correct.

18 Q Very good. Examine what has been marked as
19 Exhibit 3, it consists of two pages. Can you identify that
20 document?

21 A Correct.

22 Q Okay. What is this document?

23 A It is in the "Visuales" system, where it showed
24 that I was an authorized signature.

25 Q At page 2, what does it say where I am

1 Q So a person that is authorized to do
2 transactions in a savings account, can really sign his or
3 her name, and identify he or herself with the teller, and
4 the teller checks the documents, sees that is an
5 authorized signature, and can approve the transaction.

6 A Correct.

7 Q I'm going to show you what has been marked as
8 Exhibit 4-A. And don't forget that you already examined
9 this group of documents. Correct?

10 A Correct.

11 Q Okay. What was this transaction documented in
12 Exhibit 4-A? What transaction that document reflect?

13 A It is a withdrawal from the line of credit, to
14 a checking account, belonging to Mr. Jose Tirado. It's the
15 same account, a withdrawal from the line of credit to the
16 checking account, belonging to Mr. Jose Tirado.

17 Q Okay. It's not signed by anybody as the
18 signature of the member.

19 A No.

20 Q Okay. And Exhibit 4-B, what transaction does it
21 reflect?

22 A A withdrawal from the line of credit.

23 Q Who signed this document?

24 A Below in the signature or in the authorization?

25 Q In the signature.

1 A This is my handwriting, I put his name.

2 Q Mr. Tirado's name.

3 A Correct.

4 Q What transaction does Exhibit 4-C reflect?

5 A A withdrawal from a line of credit.

6 Q Where it says signature of the member, what
7 names appear?

8 A The name that appears is Jose A. Tirado and my
9 initials next to it.

10 Q Who wrote that entry?

11 MR. SÁNCHEZ:

12 The signature entry?

13 MR. MENDOZA:

14 Yeah.

15 DEPONENT:

16 I don't understand the question.

17 MR. MENDOZA:

18 Q Where it says signature of the member, who wrote
19 the names that appear there?

20 DEPONENT:

21 A I did.

22 Q I going to show you now, Exhibit 4-D.

23 MR. SÁNCHEZ:

24 She wants to make a question, but I told him that I
25 cannot talk to her.

1 MR. MENDOZA:

2 Okay, okay.

3 Q What transaction it documents?

4 DEPONENT:

5 A Withdrawal from a line of credit.

6 Q And in the signature member entry, who wrote
7 that there?

8 A I did. My initials are next to it.

9 Q And what does it says, in signature of member?

10 A Jose A. Tirado.

11 Q And we'll show you now what has been marked as
12 Exhibit 4-E, and ask you what transaction it shows.

13 A Withdrawal from the line of credit.

14 Q And where it says signature of the member, what
15 does it say?

16 A Jose A. Tirado and my initials next to it.

17 Q And who wrote that?

18 A I did, Wanda.

19 Q I'm going to show you now what has been marked
20 Exhibit 4-F. And what transaction does it document?

21 A Withdrawal from a line of credit.

22 Q Where it says signature of the member, what does
23 it say?

24 A Jose A. Tirado and my initials next to it.

25 Q And who signed that?

1 A Me, Wanda Daumont.

2 Q And what has been marked as Exhibit 4-G, can you
3 tell me what it shows or documents?

4 A Withdrawal from a line of credit.

5 Q And in the members signature, what does it show?

6 A The name of Jose A. Tirado Meléndez.

7 Q And who wrote that in?

8 A I did.

9 MR. MENDOZA:

10 "Vamos fuera de récord un momento".

11 OFF THE RECORD

12 MR. MENDOZA:

13 Q On June 27th, 2012, you were notified a
14 reprimand by Mrs. Irma Hilerio Arroyo. Correct?

15 DEPONENT:

16 A No.

17 Q Okay. Can you mark this as the next exhibit
18 please?

19 MR. SÁNCHEZ:

20 ¿Hilerio, verdad?

21 INTERPRETER:

22 Hilerio.

23 MR. MENDOZA:

24 Please examine what has been marked as Exhibit 5 of
25 this deposition.

1 Q Have you examined it?

2 DEPONENT:

3 A Correct.

4 Q Have you seen this document before?

5 A Correct.

6 Q Is your signature the one that is at the bottom
7 of the document?

8 A Correct. My initials.

9 Q Can you read out loud the last paragraph?

10 A This one?

11 Q Yes.

12 A "You are warned that if a situation similar to
13 the ones previously described, come up and according to
14 the authorization I have of imposing disciplinary
15 measures, you could be subject to measures that could be
16 up to your dismissal".

17 Q And do you consider this or not to be a
18 disciplinary measure?

19 A No.

20 Q Why not?

21 A Because if you see in the bottom part, I signed
22 "I read this but I do not agree with it".

23 Q So, for a memo to be considered... No. It's
24 okay. Strike the question.

25 The fact is that in June 16th, 2012 you authorized

1 MR. SÁNCHEZ:

2 Yes. Asked and answered. She answered.

3 MR. MENDOZA:

4 But that's... Very well. Go ahead, give me your...

5 MR. SÁNCHEZ:

6 You can answer the question. The objection still
7 remains.

8 DEPONENT:

9 I am not understanding.

10 MR. MENDOZA:

11 Q This is very clear. Does the letter tell you
12 that you could be terminated. Yes or no?

13 DEPONENT:

14 A Yes, if a similar situation happened again.

15 Q You responded to that letter. Yes or no?

16 A Yes.

17 MR. MENDOZA:

18 Mark this as the next exhibit.

19 MR. SÁNCHEZ:

20 ¿Qué va a ser el exhibit? ¿Seis?

21 MR. MENDOZA:

22 Seis. Exhibit 6.

23 MR. MULLER:

24 Here is for counselor.

25

1 MR. MENDOZA:

2 She said so.

3 MR. SÁNCHEZ:

4 Okay.

5 MR. MENDOZA:

6 I have no problem.

7 Q You put your initials there, before or after the
8 check was cashed? And please answer telling me, before or
9 after it was cashed.

10 DEPONENT:

11 A Before.

12 Q Did you consult the transaction of the cashing
13 of the check issued to your daughter with any person with
14 a higher position than yours in Caguas Coop? And please...

15 A No.

16 Q Okay.

17 A No.

18 Q Okay.

19 MR. SÁNCHEZ:

20 Can we go off the record?

21 MR. MENDOZA:

22 Yeah. Let's go off the record.

23 OFF THE RECORD

24 MR. MENDOZA:

25 I have been meeting with Mr. Mueller and Mr. Sánchez

COURT REPORTER'S CERTIFICATION

Court Reporter

EXHIBIT 2



COOPER DE AHORRO Y CREDITO
CAGUAS
 APARTADO 1252
 CAGUAS P.R. 00726

CAJA DE DESEMBOLSO
 LINEA DE CREDITO
 TEL. 746-9595

HOJA DE DESEMBOLSO LINEA DE CREDITO

NUMERO DE SOCIO

NOMBRE DEL SOCIO

FECHA

AUTORIZACION

CANTIDAD A CARGARSE A LA LINEA DE CREDITO ARRIBA MENCIONADA

INICIALES CAJERO

 NUMERO DE
 SEGURO SOCIAL

FEB 20 2015

 AUTORIZO SE CARGUE A MI
 LINEA DE CREDITO EL IMPORTE
 AQUI ESTIPULADO

FIRMA DEL SOCIO

Cajero 150

PROTEGE TU CREDITO. PAGA PUNTUALMENTE TUS OBLIGACIONES

EXHIBIT 3

**CAGUAS COOP**

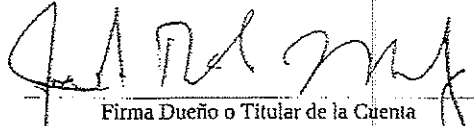
Sucursal Central

Avenida José Gautier Benítez Carr # 1 Km 37.5 Caguas, PR 00726-1252

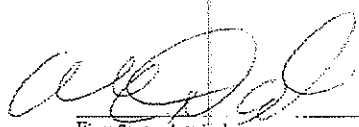
Sucursal Pueblo

Avenida Muñoz Rivera Esquina Lope Flores Caguas, PR 00726-1252

**SOLICITUD DE AUTORIZACIÓN DE PERSONAS A REALIZAR TRANSACCIONES
(ANEJO A)****Información de Dueño de la Cuenta**

Núm Cuenta:	Nombre:	JOSE A TIRADO MELENDEZ	
Licencia: CONDUCTOR	Emisión: 28/9/2010	Expiración: 19/8/2016	Seguro Social:
Número: 713378			
		28 de febrero de 2015	
Firma Dueño o Titular de la Cuenta		Fecha:	

Información de Persona Autorizada I

Nombre:	Sexo:	Seguro Social:	Estado Civil:	Dependientes:
WANDA E DAUMONT COLON	F		NO CASADO	0
Tipo ID:	ID#:	Emisión:	Expiración:	
Licencia	0710003	PR	07/02/2020	
Fecha Nacido:	Idioma:	Email:		
07/02/1954				
Dirección Residencial:	Dirección Postal:			
URB NOTRE DAME B16 CALLE SAN BARTOLOME	URB NOTRE DAME B16 CALLE SAN BARTOLOME			
CAGUAS PR, PR 00725	CAGUAS PR 00725-0000			
CAGUAS PR, PR 00725	00725-0000			
Teléfono:	Teléfono Celular:			
() - -	(787)-214-1860			
Lugar de Trabajo: CAGUASCOOP	Teléfono Trabajo: (787)-746-9595			
Ingreso Mensual: \$3,400.00	Ext:			
Ocupación: Gerente Sucursal Cooperativa	Supervisor Inmediato: RAMON ADORNO			
		28 de febrero de 2015		
Banda de Riesgo: L		Fecha:		

PARA USO DE LA COOPERATIVA

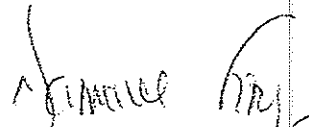

	OFAC REVISADO POR: DJ
	FIRMA Y FOTO: N/A
PREPARADO POR: DAMARIS JIMENEZ JIMENEZ	FECHA: 28 de febrero de 2015
REVISADO POR: 	FECHA: 3/3/15

EXHIBIT 4



Nombre: JOSE A TIRADO MELENDEZ

Caguas Coop Central ☒
Caguas Coop Pueblo ☐

Solicitud de Autorización de Personas a Realizar Transacciones

Yo, JOSE A TIRADO MELENDEZ autorizo a la siguiente(s) persona(s) en la cuenta


de AHORROS con el número de cuenta [REDACTED] en el día de hoy 28 de febrero de 2015.

Informo además, que de entender necesario el realizar algún cambio de firma(s) autorizada(s) tengo la obligación de visitar la Cooperativa de Caguas Coop para enmendar nuevamente la autorización de firma o firmas en mi cuenta [REDACTED].

Menciono que la(s) persona(s) autorizada(s) con dirección postal: URB NOTRE DAME B16 CALLE SAN BARTOLOME CAGUAS PR 007250000 y la dirección física: URB NOTRE DAME B16 CALLE SAN BARTOLOME CAGUAS PR, PR 00725 con el número de teléfono: () - y su identificación es el número: 0710003 que corresponde a la identificación de: Licencia.

☒ Autorizo a que se le provea información por teléfono del balance actual de la cuenta antes mencionada a la(s) persona(s) aquí autorizada(s). Esta autorización revoca el inciso (1) del documento Autorización para Proveer Información Financiera por Teléfono.

Firmando hoy 28 de febrero de 2015 en Caguas Coop.


JOSE A TIRADO MELENDEZ
Firma Dueño Cuenta


WANDA E DAUMONT COLON
Persona Autorizada

EXHIBIT 5

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

WANDA E. DAUMONT COLÓN

Plaintiff,

Vs.

COOPERATIVA DE AHORRO Y CRÉDITO DE
DE CAGUAS; IRMA HILERIO ARROYO AS
OFFICER AND IN HER PERSONAL
CAPACITY

Defendants

* CIVIL NO.: 15-3120
*
*
*
* AGE DISCRIMINATION IN
* EMPLOYMENT ACT (ADEA),
* PUERTO RICO LAW 100, 29
* L.P.R.A., 146, LAW 80, 29
* L.P.R.A., § 185
*
* Jury Trial Requested
*

DEPOSITION OF MS. JESSYBEL ALEXANDRA MATOS AYALA

DATE : May 24, 2017
TIME : 9:55 A.M.
CLIENT : ALDARONDO GIRALD LAW P.S.C.
ADDRESS : 2 Vela Street, Esquire Building
Seventh Floor, Suite 701
San Juan, Puerto Rico

APPEARANCES

FOR PLAINTIFF:

Ericson Sánchez Preks, Esq.

FOR DEFENDANTS:

Enrique J. Mendoza Méndez, Esq.
Otto Y. Müller Vázquez, Esq.

NOTARY PUBLIC:

Ericson Sánchez Preks, Esq.

1 during this day, that could affect in any way the
2 understanding that you could have regarding anything
3 that I ask during the process, or to answer, or that
4 could affect any answer that you can provide during the
5 process?

6 A No.

7 Q Apparently you can understand English.

8 A Mmhm.

9 Q Am I right?

10 A Yes. Quite a lot.

11 Q And another detail. Everything -- any answer
12 that you provide must be in words, you have to answer
13 verbally, because gestures and signs cannot be recorded.

14 A Recorded. I know.

15 Q Okay. So, if anyone -- the interpreter,
16 myself, Atty. Mendoza, Atty. Müller, the court reporter
17 make you any gesture, so you can speak, don't be mad or
18 something--

19 A No. I know, I know.

20 Q Okay.

21 A I know the process.

22 Q Okay. Have you been in a deposition
23 previously?

24 A Not as a deponent.

25 Q Okay. Have you been present in any other

1 Q Were you member of any other association
2 related with Compliance Officers--

3 A No.

4 Q --or compliance?

5 A No.

6 Q Do you recall when you began to be a member of
7 the Compliance Officers Association, more or less?

8 A June or July of 2012.

9 Q In the summer.

10 A Yes.

11 Q When you began to work at the Cooperativa?

12 A February 2010.

13 Q You began as a service representative.

14 A Yes.

15 Q For how long you worked as a service
16 representative of the Cooperativa de Caguas?

17 A I don't remember, I worked there for a while,
18 and I served on many positions, so I don't recall the
19 exact time frame for each one of those positions.

20 Q Okay. The first position was service
21 representative.

22 A Receptionist/Customer Service.

23 Q And when you say "receptionist," you mean that
24 was the first position you began to work at the
25 Cooperativa, or it's one of the positions?

1 competency of Human Resources, and I was not part of
2 Human Resources. At the time, I was in Compliance.

3 Q Okay, but my question was, what was your
4 participation, if any, in the termination of Ms. Wanda
5 Daumont?

6 A None.

7 Q Did you participate in the investigation of
8 the reasons to discharge Ms. Wanda Daumont?

9 A If the question is, whether or not I was
10 involved in any investigation regarding an event
11 involving Ms. Daumont, the answer would be "yes."

12 Q In the investigation related to, or was
13 related to the reasons to terminate Ms. Wanda Daumont?

14 A As I told you before, I am not part of the
15 Human Resources area, so I am not aware whether or not
16 that was part of the basis for the termination of Mrs.
17 Daumont.

18 Q When was that investigation took place?

19 A When? Well, that investigation emerged after
20 a certain event that was brought to my attention, but I
21 did not participate directly in that investigation; I
22 only participated indirectly, as was required of me.

23 Q But the question was, when?

24 A Yes, I know "when?" but by "when?" do you mean
25 -- I mean, an exact date? I don't have an exact date.

1 Q In what year you made that investigation, or
2 you participated in that investigation?

3 A If memory serves me well, 2014, 2015 -- 2015.

4 Q Was that around March, February 2015?

5 A If you're talking about the last event
6 involving Ms. Daumont, it should've been around those
7 months.

8 Q Okay. I am asking about the investigation
9 that you participated, or the process that you
10 participated, not directly, but indirectly, regarding
11 the matters you investigated. Because you have not
12 stated what was the matter.

13 So I am asking you when it happened, and you
14 stated -- I asked the year--

15 A Yes.

16 Q --and now I'm asking regarding that
17 investigation that you described, if it could have been
18 on March, February of 2015.

19 A Yes, I'm making reference to the last
20 investigation, and the dates, because you have not
21 established exactly the events that you're referring to,
22 because obviously I worked with several situations.

23 If you're referring to the last event,
24 regarding Ms. Daumont, those are the dates; February or
25 March of 2015.

1 Q And just to be clear with your statement --
2 and let me clarify this: My question was related, when
3 was the event of the investigation that you
4 participated, and that was related in any manner with
5 Ms. Wanda Daumont's termination? Ms. Wanda Daumont was
6 terminated around March 2015.

7 A Mhm. Yes.

8 Q Okay. And I am being very specific because
9 the defendant has stated under oath that no other event
10 was considered.

11 A For that, no.

12 Q That's the information I want.

13 A Okay.

14 Q So, my questions are related precisely to Ms.
15 Daumont's termination.

16 A Okay.

17 Q Okay. And the beginning of the question was
18 regarding what events, what participation you had. And
19 so I am asking you: What was the event that was
20 addressed to you that you participated in an indirect
21 manner?

22 A Well, what was brought to my attention was a
23 transaction with a line of credit, where Ms. Daumont
24 signed on behalf of some other person, and said
25 authorization was not duly authorized.

1 Q And when you say "it was not duly authorized,"
2 you mean it was not authorized by the person in charge
3 to authorize that kind of transaction?

4 A Exactly.

5 Q And who brought you that information, who
6 brought you that situation?

7 A The cashier supervisor at the time.

8 Q And who was the cashier supervisor?

9 A Joanny Torres.

10 Q Ms. Joanny Torres.

11 A Yes.

12 Q Okay. And Joanny Torres, to the best of my
13 knowledge, she brought you a slip or document--

14 A Mmhm.

15 Q --and the transaction was a withdrawal from
16 the credit line in the amount of \$80, and the deposit of
17 that same amount in an account of the same client.

18 A The transaction that she brought me up was the
19 withdrawal slip for the line of credit, for an amount
20 that I cannot recall; that was the only thing that she
21 brought me, because that's the only one that requires
22 authorization.

23 Q And that document had to be authorized by
24 whom?

25 A In the case of Wanda Daumont?

1 Q In the case that you have described, of the
2 event that was brought to you.

3 A It's supposed to be by the supervisor of the
4 person.

5 Q And who was the supervisor of the person?

6 A Ramón Adorno.

7 Q Ramón Adorno.

8 A Mmhm.

9 Q And who was the person who had to obtain that
10 authorization?

11 A I believe that would be Ms. Daumont.

12 Q But isn't it a fact that Ms. Daumont cannot
13 participate in any way in the transactions related to
14 herself, or one person directly involved with her, at
15 the Cooperativa?

16 A Well, what she would be doing is -- what she
17 would be asking for would be the authorization, she
18 would not becoming involved, or given the authorization
19 in order to carry out the transaction.

20 Q Okay. Isn't it a fact that the person that
21 received the transaction is the cashier?

22 A Yes.

23 Q And the cashier has to hand that document to
24 obtain authorization from the cashier's supervisor?

25 A Yes.

1 Q And the cashier's supervisor, wouldn't it be
2 fair to say that had to verify if there is another
3 authorization to be obtained?

4 A Can you please repeat the question?

5 Q Wouldn't it be fair to say that the
6 supervisor, in that line of procedure--

7 A Mmhm?

8 Q --the cashier, the cashier to the cashier
9 supervisor, and the cashier supervisor should have been
10 the person, if any other authorization was required, to
11 obtain that authorization?

12 A According to the manual for the cashier area,
13 in the case of a managerial employee, it is the
14 managerial employee that should request the
15 authorization, to the best of my recollection.

16 Q Okay. So, to the best of your recollection,
17 Ms. Wanda Daumont could have requested the authorization
18 to her supervisor, in that case, to the best of your
19 recollection, would be Mr. Ramón Adorno, the V.P., the
20 Operations V.P., in a transaction where she was involved
21 directly, or indirectly. Is that correct?

22 A That is correct. And in the case of the
23 cashier who receives the slip, not having the
24 authorization, he would have -- and the supervisor not
25 being there -- he would have to ask higher-up, and

1 A Mmhm?

2 Q --how serious is a situation in which it is
3 determined that a branch manager falsified the signature
4 of a member?

5 A From the standpoint of compliance, it's a big
6 offense because, first of all, it is a crime that is
7 typified in the criminal court of Puerto Rico.

8 Second, among the things that are dealt with
9 in money-laundering, one of the modalities that are
10 discussed in regards to money-laundering is fraud, and
11 within fraud there is the forfeiture of signatures and
12 identity theft.

13 So, the forfeiture of signatures or fraud can
14 be identified as identity theft, and it falls within the
15 modalities of money-laundering.

16 And here we have a person who is supposed to
17 be an example to be followed by her coworkers in the
18 area of the cashiers, and the entire branch, who is in
19 violation of both the policies and procedures
20 established both in the Compliance Program and the
21 internal policies of the Credit Union.

22 And it could be understood that even a crime,
23 that is typified under the Criminal Code of Puerto Rico,
24 is being committed. So it's something that's serious.

25

1 MR. MENDOZA:

2 I would like to discuss with the interpreter.

3 THE INTERPRETER:

4 Yes.

5 MR. MENDOZA:

6 Because I believe "forfeiture"--

7 THE INTERPRETER:

8 Mhm?

9 MR. MENDOZA:

10 --is not the right translation, where

11 "falsification" was to "falsify."

12 THE INTERPRETER:

13 Okay.

14 MR. MENDOZA:

15 "Falsification."

16 THE INTERPRETER:

17 Mhm. Oh, Gawd, yes, actually, yes, you're right.

18 Actually the word that I would use is "forged."

19 MR. MENDOZA:

20 Okay.

21 THE INTERPRETER:

22 So, do you want me to do the whole thing, or just

23 stipulate that where I said "forfeiture," we were

24 talking about "forgery" and "forged."

25

1 MR. MENDOZA:

2 If it is okay with Counselor, with that correcting
3 note, I can live with that.

4 MR. SÁNCHEZ:

5 If that is the opinion of the interpreter, that
6 "forfeiture" or "forged" is the proper--

7 THE INTERPRETER:

8 "Forged, forged" and "forgery." To "forged" and
9 "forgery."

10 MR. SÁNCHEZ:

11 We agree on that.

12 THE INTERPRETER:

13 I apologize--

14 MR. MENDOZA:

15 No problem.

16 THE INTERPRETER:

17 --and I agree with you.

18 MR. MENDOZA:

19 So the witness' testimony stands corrected as far
20 as that word is concerned. Correct?

21 THE INTERPRETER:

22 Yes.

23 MR. MENDOZA:

24 Counsel, that is the stipulation?

25

1 THE INTERPRETER:

2 "The forgery of a signature..."

3 MR. SÁNCHEZ:

4 Yes.

5 MR. MENDOZA:

6 Okay, very well. And I would like to ask the
7 deponent whether she was finished with her answer, when
8 she stopped to allow the interpreter to do his job.

9 THE DEPONENT:

10 Yes, I finished.

11 MR. MENDOZA:

12 Okay. Very well.

13 Can the following document be marked as the next
14 exhibit in this deposition?

15 COURT REPORTER:

16 Exhibit 4.

17 (Whereupon, the above-referenced document was
18 marked for identification as Exhibit 4 of the
19 deposition.)

20 BY MR. MENDOZA:

21 Q Please examine what has been marked as Exhibit
22 4, and let us know when you have done so.

23 (Deponent reviews document.)

24 A Yeah.

25 Q Exhibit 4 has been dealt with in this case as

1 the image in the system Visuales, in which, in the
2 account of Mr. José A. Tirado, Mrs. Daumont, in the
3 section of "relatives," is included, and it said
4 "authorized signature." Correct?

5 A Correct.

6 Q Okay. And that was the document that you were
7 referring to in your testimony this morning, when you
8 said that you checked the file itself, of the account of
9 Mr. Tirado, and you found no authorization for Mrs.
10 Daumont, but when you checked the system, this is what
11 it showed.

12 A Correct.

13 Q Okay. And the fact is that that authorization
14 does not authorize Mrs. Daumont to forge the signature
15 of Mr. Tirado in the transactions done in these accounts
16 of Mr. Tirado.

17 A This authorization does not authorize her to
18 carry out any transactions, neither in Mr. Tirado's
19 account, nor in Mr. Tirado's credit line.

20 Q Nor from Caguas Coop's point of view
21 authorized her to forge Mr. Tirado's signature.

22 MR. SÁNCHEZ:

23 Objection to the question.

24 MR. MENDOZA:

25 Very well.

1 THE DEPONENT:

2 Of course not.

3 BY MR. MENDOZA:

4 Q And from the point of view of a compliance
5 officer, when you were such, it does not.

6 A Of course not. Nothing authorizes the forgery
7 of anybody's signature.

8 Q When you were asked certain questions
9 concerning exceptions to certain procedures concerning--

10 A Mmhm?

11 Q --authorization of transactions, a reference
12 was made to certain testimony from Mrs. Irma Hilerio, as
13 to exceptions.

14 You said that if she did so, it was her
15 responsibility. Correct?

16 A Correct.

17 Q So, if Mrs. Wanda Daumont did some exceptions,
18 she did so at her responsibility.

19 A Yes.

20 Q Okay. Based on your participations in the
21 event of the cashing of the manager's check, that was
22 done in late January 2015, early February 2015, did at
23 any point in time it show that Mrs. Daumont consulted
24 the transaction that she was about to authorize with any
25 official of Caguas Coop of the highest hierarchy that

1 Q So, actually, as per the documents, the person
2 doing the transaction is María T. Ayala de Martínez, and
3 based on your testimony, and the information here, she
4 was duly identified.

5 A Yes.

6 Q It mentions the documents, and her license,
7 and her personal circumstances--

8 A Correct.

9 Q --so the issue was not whether Mrs. Ayala de
10 Martínez was whom she represented to be. There was no
11 issue with that.

12 A No.

13 Q Okay. The issue was whether the person for
14 whom she was doing the transaction, a corporate entity
15 by the name of Damart Development Management had
16 effectively, or actually, authorized her to do so.

17 A Correct.

18 Q Okay. (Pause.) You were asked about your
19 intervention, if any, in the investigation, or
20 consideration, of the transaction done by Mrs. Daumont,
21 first, the one concerning the withdrawal of the credit
22 line of Mr. Tirado, and, two, this transaction of this
23 corporate entity Damart, correct?

24 A Correct.

25 Q Okay. Aside from those two, were there any

1 other instances or situations in which you came to be
2 involved concerning any issues with Mrs. Daumont not
3 following Caguas Coop policies, procedures, and rules?

4 MR. SÁNCHEZ:

5 Objection to the questions. First, this was not
6 part of the deposition's interrogatory, because of
7 information provided by the defendant. And now the
8 defendant wants to open the situation to other matters
9 outside those two events.

10 MR. MENDOZA:

11 Counselor, this is discovery. I'm not limited by
12 that.

13 MR. SÁNCHEZ:

14 I know it's discovery.

15 MR. MENDOZA:

16 It is discovery.

17 MR. SÁNCHEZ:

18 I know it is discovery, but I am asking the
19 question, and presenting the objection, because of
20 defendant's position that there were only two matters
21 that were took into considerations for the termination,
22 were those two events. Just that.

23 MR. MENDOZA:

24 I'm not going to argue whether that is so, or--

25

1 MR. SÁNCHEZ:

2 That's the--

3 MR. MENDOZA:

4 --or whether--

5 MR. SÁNCHEZ:

6 --the objection, please note it.

7 MR. MENDOZA:

8 But let me -- are you done, Counsel?

9 MR. SÁNCHEZ:

10 Yes.

11 BY MR. MENDOZA:

12 Okay. I am not posing my position here whether you
13 are correct or not, okay, or whether your objection
14 stands or not. Your objection is noted, I think it's
15 fair game in discovery, but why we are here as to those
16 other arguments, the deposition is not the place to make
17 them.

18 Q Please answer the question.

19 A Yes. I was involved in an investigation
20 involving Ms. Daumont.

21 Q And what it relates to?

22 A To the best of my recollection, it had to do
23 with a transaction with a check in the name of Ms.
24 Daumont's daughter, that she authorized when the funds
25 are not available in the account.

1 Q And what were your findings concerning that
2 situation?

3 A I found that Mrs. Daumont had been involved in
4 a transaction with a check belonging to her daughter --
5 and this is against the policies and procedures of the
6 institution -- because there would be conflict of
7 interest given her position as, their relationship as
8 mother and daughter. That would be the first point.

9 The second point is that there were no
10 available funds to cover the check that she authorized.

11 Q And based on your recollection, was there any
12 disciplinary action resulting from your findings?

13 A Yes. I do know that in that occasion, I did
14 meet with Ms. Daumont, and Lourdes Rodriguez from Human
15 Resources, a meeting where the findings about this
16 situation were discussed.

17 But as I have stated before, as a compliance
18 officer, I'm not from the area of Human Resources, and
19 it is Human Resources that makes a determination as to
20 whether or not any disciplinary action is to be taken.

21 So, in this case, I did not -- I was not
22 informed of such a decision.

23 Q Very well. Thank you.

24 Those are my questions for now, Counselor.

25

EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

WANDA E. DAUMONT COLÓN	* CIVIL NO.: 15-3120 (GAG/CVR)
	*
Plaintiff	*
	*
Vs.	* AGE DISCRIMINATION IN
	* EMPLOYMENT ACT (ADEA);
COOPERATIVA DE AHORRO Y CRÉDITO	* PUERTO RICO LAW 100, 29;
DE CAGUAS; IRMA HILERIO ARROYO	* L.P.R.A., 146, LAW 80,29
AS OFFICER AND IN HER PERSONAL	* L.P.R.A. § 185
CAPACITY	*
	* Jury trial requested
Defendants.	*
	*

DEPOSITION OF MS. DAMARIS JIMÉNEZ JIMÉNEZ

DATE : April 28, 2017

TIME : 9:41 A.M.

CLIENT : ALDARONDO GIRALD LAW P.S.C.

ADDRESS : 2 Vela Street, Esquire Building
Seventh Floor, Suite 701
San Juan, Puerto Rico

APPEARANCES

FOR PLAINTIFF:

Ericson Sánchez Preks, Esq.

FOR DEFENDANTS:

Enrique J. Mendoza Méndez, Esq.
Otto Y. Müller Vázquez, Esq.

NOTARY PUBLIC:

Ericson Sánchez Preks, Esq.

1 A I think about a year.

2 Q Therefore, you began to work as an employee of
3 the around, more or less, 2001?

4 A I think so.

5 Q Yes. Just to clarify: When one of us makes
6 this gesture, in moving the hands, it's for you to tell
7 because you are just making a gesture, or moving your
8 head, or saying "mmhm."

9 A I didn't realize it.

10 Q I know. That's why we are telling you so.
11 Don't be offended if we do that. Okay. You stated that
12 you, after concluding your Professional services at the
13 Cooperativa, you began to work at the Customer Service
14 Department.

15 A That's correct.

16 Q What was your position?

17 A Customer service.

18 Q Is that a position in fact, or it is the name
19 of the department?

20 A They've changed the name. Before, if I'm not
21 mistaken, it was called "Platform Officer."

22 Q And what is the actual name at the present?

23 A Representative for Cooperative Services.

24 Q Since when, more or less, you have that
25 particular title?--Representative of Cooperative

1 Q No yellow cards.

2 A No.

3 Q Is that an area that you work with?

4 A I don't work in the register area.

5 Q Do you have knowledge as to whether there are
6 yellow cards for checking accounts, and also yellow
7 cards for saving accounts? Or you are not knowledgeable
8 about that?

9 A Savings accounts do not have cards.

10 Q So your testimony is that Exhibit 2 and 3, by
11 virtue of those, Mr. Tirado Meléndez was authorizing
12 Mrs. Daumont Colón to do transactions in which accounts?

13 A In the savings.

14 Q And that's why Exhibit 3 says "savings."

15 A Yes.

16 Q And this Exhibit 2 and 3, my question is
17 whether they were done to update what was already in the
18 Visuales system.

19 A Yes.

20 Q Does Exhibit 1, which is the print screen from
21 Visuales, and Exhibit 2 and 3, that are the two
22 documents of the authorization given on February 28,
23 2015, do those documents authorize Mrs. Daumont to take
24 a mortgage loan on behalf of Mr. Tirado?

25 A No.

1 Q Does it authorize Mrs. Daumont to take a
2 personal loan on behalf of Mr. Tirado?

3 A No.

4 Q Does it authorize Mrs. Daumont to activate any
5 credit line given by Caguas Coop to Mr. Tirado?

6 A No.

7 Q Does any of these three documents authorize
8 Mrs. Wanda Daumont to make transactions in Caguas Coop
9 in any of the accounts of Mr. Tirado, signing herself as
10 if, with the name "José Tirado"? Using the signature
11 José Tirado.

12 A No.

13 Q Okay. Thank you.

14 MR. MENDOZA:

15 Counselor...?

16 MR. SÁNCHEZ:

17 You're finished?

18 MR. MENDOZA:

19 For the moment, yes.

20 MR. SÁNCHEZ:

21 Okay.

22 REDIRECT EXAMINATION

23 BY MR. SÁNCHEZ:

24 Q Continuing with the last question, regarding
25 the Exhibit No. 2, 3, and 1 that Mr. Mendoza already

1 showed you, and that we have been using during this
2 deposition.

3 To take a loan is something new for the members,
4 so, to take a loan is not an authorization, it's not an
5 update, it's just like to open a request to the credit
6 union. Or requesting something new to the Cooperativa.

7 A Of a loan?

8 Q Yes.

9 A Yes.

10 Q Okay. It's the same for, when you take a
11 mortgage loan. It's something new for the member, of
12 the clients, for the Cooperativa.

13 A Yes.

14 Q It's not the same as to request or make an
15 update of an authorization.

16 A No, it's not the same.

17 Q Okay. The same, to activate a credit line is
18 a new request by the member, or the client, to the
19 credit union.

20 MR. MENDOZA:

21 I have an objection, because it is misleading.
22 "Activate" doesn't mean "a new." I just want to note
23 that.

24 MR. SÁNCHEZ:

25 Okay. Let's rephrase the question.

1 A Yes.

2 Q Therefore, and Mr. Tirado and Ms. Daumont
3 signed the document, which we have identified as Exhibit
4 No. 4 (sic) -- as Exhibit No. 2; sorry. Am I correct?

5 A Yes.

6 Q Okay. And later, the system print Exhibit No.
7 3, automatically, and they sign it.

8 A Yes.

9 Q Okay. But Mr. Tirado was basing the signature
10 in Exhibit No. 3 in the information he already signed in
11 Exhibit No. 2.

12 A Yes.

13 MR. SÁNCHEZ:

14 No further questions.

15 MR. MENDOZA:

16 This is Enrique José Mendoza Méndez.

17 RECROSS EXAMINATION

18 BY MR. MENDOZA:

19 Q Please tell me if it is correct to conclude,
20 from your testimony, that Exhibit 1, 2, and 3 do not
21 authorize Mrs. Daumont to act on behalf of Mr. Tirado
22 Meléndez for all products and services provided by
23 Caguas Coop?

24 A No, she is not authorized on everything.

25 Q Okay. Now, please tell me, from Exhibit 1, 2,

1 and 3, which -- if any -- authorizes Mrs. Wanda Daumont
2 to go to a teller and make a withdrawal from Mr.
3 Tirado's line of credit and to, with the withdrawal
4 slip, she herself signed José Tirado?

5 A If in any of the documents? No.

6 Q Tell me, if at any point time, either/or both,
7 or any of them individually, Mr. Tirado Meléndez and
8 Mrs. Daumont asked you to prepare documents to authorize
9 Mrs. Daumont to sign, as if she was José Tirado, in any
10 of his accounts?

11 A No, they did not authorize me.

12 Q Okay, thank you.

13 FURTHER REDIRECT EXAMINATION

14 BY MR. SÁNCHEZ:

15 Q Do you know whether Mr. José Tirado authorized
16 Ms. Daumont to prepare as a withdrawal from the credit
17 line, and to sign his name in the document?


18 A No.

19 Q Isn't it a fact that in the credit union, that
20 a member can call any of the officers and tell him,
21 "Make a withdrawal for my account and place it in my --
22 from my credit line--" sorry "--and to deposit in my
23 checking or savings account"?

24 A No.

25 Q Do you know?

EXHIBIT 7



Socio Número Seguro Social *****9913 Tutor/DBA

Nombre JOSE A. TIRADO MELEI

Socio

Opciones

[Cliente]

- Abrir / Cerrar Cuentas
- Autorizados
- Balance
- MasterCard
- Certificado De Deposito
- Cheques Devueltos
- Holds
- Información
- Automovil
- Depositos
- Deudas
- Dirección
- Empleo
- Parientes Cercanos
- Propiedades
- Libreta De Pago
- Mensajes
- Prestamos

Parientes Cercanos

Nombre Del	Relación	Telefono
<input type="text"/>	<input type="text"/>	<input type="text"/>
Dirección		
<input type="text"/>		

Pariente	Relación	Telefono	Dirección
WANDA DAUMONT	FIRMA AUTORIZAD	716-0861	LAS PIEDRAS

10.1.110 Ramon Adorno Rivera 3/9/2012 CAGUAS SERVER CustMasSQL

EXHIBIT 8

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

WANDA E. DAUMONT COLÓN

Plaintiff

vs.

COOPERATIVA DE AHORRO Y CRÉDITO
DE CAGUAS; IRMA HILERIO ARROYO
AS OFFICER AND IN HER PERSONAL
CAPACITY

Defendants

* CIVIL NO.: 15-3120 (GAG-CVR)

*

*

* AGE DISCRIMINATION IN

* EMPLOYMENT ACT (ADEA),

* PUERTO RICO LAW 100, 29

* L.P.R.A., 146, LAW 80, 29

* L.P.R.A., §185

*

* JURY TRIAL REQUESTED

*

*

*

DEPOSITION OF MR. RAMÓN ADORNO RIVERA

DATE : June 9, 2017

TIME : 9:40 a.m.

CLIENT : ALDARONDO-GIRALD LAW PSC

ADDRESS : 2 Vela Street, Esquire Building
Seventh Floor, Suite 701
San Juan, Puerto Rico

APPEARANCES

FOR PLAINTIFF:

Ericson Sánchez Preks, Esq.

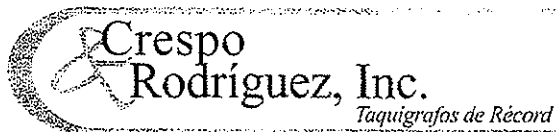
FOR DEFENDANTS:

Enrique José Mendoza Mendez, Esq.

Otto Y Müller Vázquez, Esq.

NOTARY PUBLIC:

Ericson Sánchez Preks, Esq.



PO Box 29002 San Juan, Puerto Rico 00929-0002
Tel. (787) 706-5930 • Fax: (787) 706-8217 • Cel. (787) 449-1965 (24 horas)
www.cresporodriguez.com • e-mail: cresporodriguez@hotmail.com

1 Q What documents was provided to you?

2 A The withdrawal slip from the credit line.

3 Q Anything else?

4 A No.

5 Q Okay. Once you received that withdrawal, what
6 step you took or what kind investigation you performed?

7 A When I saw that the slip was not signed by an
8 authorized or authorized by an officer, I interviewed the
9 teller that carried out the transaction. When I
10 interviewed him he told me that the owner of the account
11 had not been present...

12 MR. MENDOZA:

13 "Of the line", not the...

14 INTERPRETER:

15 Correction, "that the owner of the credit line had
16 not been present..."

17 DEPONENT:

18 A And, so I then verified the files to see, to
19 verify the signature, to see if it was the client's or
20 not. When I saw that, that was not signature of the owner
21 of the account, I proceeded to notify the Executive
22 President, Irma Hilerio.

23 Q What happened then?

24 A When I notified her of this, she instructed me
25 to carry out a deeper investigation or a more profound

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1 investigation.

2 Q What's the name of the, I think you said,
3 "teller", that you interviewed?

4 A Norberto Santos.

5 Q When you met with Mr. Norberto Santos?

6 A I do not recall the specific date, but it was
7 after February 20th, I think it was the day after, but I
8 don't recall exactly.

9 Q What else Mr. Norberto Santos told you about
10 that transaction, the withdrawal of the credit line?

11 A He first told me that the person had not been
12 present. He told me that he had done without the
13 authorization, and he had done it because Wanda was his
14 boss.

15 Q What else he told you?

16 A Nothing else, that was just at the beginning of
17 the investigation.

18 Q So, to the best of your recollection, you're
19 stating that Mr. Norberto Santos told you that he
20 performed the transaction because Ms. Daumont was his
21 supervisor, nothing else?

22 A That's correct.

23 Q Mr. Norberto Santos... strike the question. Was
24 that transaction or Mr. Norberto Santos handed that
25 transaction to any supervisor, the cashier's supervisor or

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1 any other officer?

2 A He brought that transaction to the head teller,
3 Joany Torres, so that she would authorized that
4 transaction.

5 MR. MENDOZA:

6 "One day after..."

7 INTERPRETER:

8 "One day after the transaction."

9 MR. SÁNCHEZ:

10 Q Why he had to bring that transaction to Ms.
11 Joany Torres?

12 A Because, the application for withdrawal from the
13 credit line requires the authorized signature of an
14 officer.

15 Q Okay. And, why... you asked Mr. Norberto
16 Santos, why he brought that transaction the day after, as
17 you stated?

18 A I didn't ask him.

19 Q Did you ask Mr. Norberto Santos why he did not
20 obtain the authorization of the officer or his supervisor
21 or anyone else when he performed that transaction?

22 A No, he didn't tell me.

23 Q You asked him?

24 A No, I didn't ask him.

25 Q In addition to meeting with Mr. Norberto Santos,

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1 Q Okay. And, after that initial investigation...
2 strike that question. That initial investigation then
3 included the verification of the initial withdrawal slip
4 that you stated and the verification of the other slip,
5 withdrawal slip that Ms. Joany Torres brought by your
6 request? Am I correct?

7 A Joany Torres brought me the first slip.

8 Q And, brought you the other slips?

9 A Jesibel Matos is the person who helped me
10 because it was a joint effort.

11 Q So, let me just clarify the record. So, Ms.
12 Joany Torres, Joany Torres brought the first slip.

13 A That's correct.

14 Q And, then she brought the other withdrawal
15 slip... no, and then you asked Ms. Jesibel Matos to bring
16 or to verify other slips?

17 A It was a joint effort because she went with me
18 to look in the other...

19 Q Okay, let's go off the record.

20 OFF THE RECORD

21 BY MR. SÁNCHEZ:

22 We have been out of the record trying to obtain the
23 correct translation for the phrase, 'el cuadro de caja' in
24 Spanish. The interpreter considered that the proper
25 translation would be, cashier tally.

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1 INTERPRETER:

2 No, the tally of the...

3 MR. SÁNCHEZ:

4 The tally of the balance?

5 INTERPRETER:

6 Of the balance.

7 MR. SÁNCHEZ:

8 Any other...

9 MR. MENDOZA:

10 That's good, we know what it means.

11 INTERPRETER:

12 Okay, I'll take it from the top then.

13 MR. SÁNCHEZ:

14 Okay, we have agreed in tally of the balance...

15 INTERPRETER:

16 For 'cuadre de caja'.

17 MR. SÁNCHEZ:

18 ...for 'cuadre' of the 'caja', okay.

19 INTERPRETER:

20 I'll take it from the top. "She helped me carry out
21 the investigation, it was a joint effort. We went to
22 investigate the tally of the balance between the two of us
23 to look for the other slips."

24 MR. SÁNCHEZ:

25 Q Okay, Mr. Adorno, okay, and that process was,

1 took place more or less around February 24, 2015?

2 A That's correct.

3 Q And, for how long was the meeting with Ms. Wanda
4 Daumont in that occasion, February 24, 2015?

5 A No longer than 20 minutes.

6 Q And, what happened in that meeting?

7 A In that meeting I told her that I was
8 investigating and looking into the withdrawals from the
9 credit line and she said in that meeting, she admitted
10 that she usually carried out those withdrawals, that she
11 was authorized in the account.

12 Q What else she told you?

13 A That she was authorized and that she usually
14 carried out those withdrawals.

15 Q Anything else she told you?

16 A That I can recall right now? No.

17 Q In addition of telling her that you were
18 performing a verification or investigation regarding the
19 withdrawal of the credit line, you asked her anything
20 else?

21 A When she told me that she was authorized in the
22 account, I told her that I had verified the file and that
23 she was not authorized in the account.

24 Q Apart from that, what is the record you
25 verified, to be sure?

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1 A In Mr. Tirado's file, the application for the
2 line of credit.

3 Q Anything else that you verified?

4 A I verified the I.D.s in order to verify the
5 signatures.

6 Q What signature?

7 A Mr. José Tirado's signature.

8 Q In the slip or in the record?

9 A We're talking about the file. I was verifying
10 the signature on file to check it against the signature on
11 the credit line withdrawal slips.

12 Q Okay, but my question was, when you said, "To
13 verify, I checked the driver's license, to verify the
14 signature", I asked what verification? The record or the
15 slip? You verified the signature in the driver's license
16 to verify the signature in the record or the signature in
17 (sic) the slip?

18 MR. MENDOZA:

19 I have an objection. To me it's confusing,
20 Counselor. So, I object to form of the question, for me
21 it's confusing.

22 MR. SÁNCHEZ:

23 Q I will rephrase it. You said, that you verified
24 the driver's license to verify the signature?

25 A That's correct.

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1 Q And, when she brought that to your attention?

2 A Early February, when she noticed it, she
3 notified me.

4 Q And, what document she brought to you?

5 A The application for the purchase of the
6 manager's checks and a letter of authorization.

7 Q That letter of authorization is the one that you
8 previously testified that you saw when the investigation
9 was performed?

10 A Which investigation?

11 Q The one that we have been talking, the
12 investigation related to the withdrawal of the manager's
13 checks.

14 A That's correct.

15 Q And, once the Ms. Jesibel Matos brought those
16 two documents to your attention, what you did?

17 A I instructed her to continue the investigation.

18 Q And, do you know what was the investigation that
19 she performed?

20 A She verified in the file whether or not there
21 was a corporate resolution that authorized the person who
22 carried out that transaction to carry it out.

23 Q What else she did? If you know.

24 A Just part of the investigation.

25 Q But, you didn't know what else she performed,

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1 what other steps she took to make that investigation that
2 you requested?

3 A No.

4 Q Did you ask her what she did?

5 A She went and look into the file to see whether
6 there was corporate resolution authorizing the person to
7 carry out the transaction and given that there was none,
8 she concluded that it was an unauthorized transaction.

9 Q Okay. And, for how long she investigated that
10 particular that transaction, the one related to the
11 withdrawal the manager's checks?

12 A About a week more or less.

13 Q And, when she met with you, after concluding
14 that intervention, what she told you, what she brought to
15 you? And, when I say, "she", I mean Ms. Jesibel Matos.

16 A When she brought to me what she had done in her
17 intervention, what she had concluded, I gave her
18 instructions to inform Ms. Irma Hilario, the Executive
19 President about it.

20 Q And, when Ms. Jesibel Matos met with you, what
21 was her, what she told you, specifically?

22 A She told me that the investigation pointed to
23 the fact that the transaction had been carried out by a
24 person without an authorization according to the file.

25 Q Anything else she told you?

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1 A No.

2 Q She made any conclusion regarding that
3 transaction?

4 A That it was a transaction that was not
5 authorized by the corporation, by the owner.

6 Q Okay. Apart from the information that Ms.
7 Jesibel Matos brought you, you perform any additional test
8 to verify or to verify the information or the transaction?

9 A No.

10 Q Do you know what Ms. Jesibel Matos told Ms. Irma
11 Hilario?

12 A No.

13 Q Did you ask or met with Ms. Jesibel Matos after
14 she spoke with Ms. Irma Hilario?

15 A No.

16 Q Okay. At any time, you asked Ms. Jesibel Matos
17 what was, what conversation she had or what did she inform
18 Ms. Irma Hilario about the transaction related to the
19 manager's checks?

20 A No.

21 Q Okay. Ms. Jesibel Matos told you anything
22 related to any particular violation that transaction, the
23 one related to the manager's checks, could involve?

24 A Yes.

25 Q What she told you?

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1 A As I said before, there was a withdrawal that
2 was done without the authorization of the corporation, so
3 that could be a violation to the regulations and practices
4 of the Credit Union and also a violation of the Bank
5 Security Act by providing information of an account to a
6 third party.

7 Q Anything else?

8 A Not that I recall.

9 Q Okay. At any time you met with Mr. José Tirado
10 to verify the information or verify whether he has
11 authorized Ms. Wanda Daumont to make the withdrawal
12 regarding or related to the credit line?

13 A No.

14 Q Did you ask Ms. Wanda Daumont any time whether
15 Mr. José Tirado authorized her to make the withdrawal from
16 the credit line?

17 A When I met with her and I indicated to her that
18 she was not authorized in the credit line.

19 Q But, my question was whether you asked
20 specifically, Ms. Wanda Daumont whether Mr. José Tirado
21 authorized her to make that transaction, the one related
22 to the withdrawal from the credit line?

23 A No.

24 Q Do you know whether Ms. Joany Torres and/or Ms.
25 Jesibel Matos met or asked Ms. Wanda Daumont regarding

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Taquígrafos de Récord

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1 whether she was authorized by Mr. José Tirado to make the
2 withdrawal from the credit line?

3 A No, the question was not necessary.

4 Q At any time, to the best of your knowledge, Ms.
5 Jesibel Matos met or contacted Mr. José Tirado to verify
6 whether he had authorized Ms. Wanda Daumont in the, to
7 make the withdrawal from the credit line?

8 A No.

9 Q You stated that regarding the withdrawal from or
10 related to the manager's checks, you were handed an
11 authorization letter.

12 A It was attached to the application, yes.

13 Q And, you said that, that authorization letter
14 was signed by the person who is authorized in the account
15 of Damar Management.

16 A That's correct.

17 Q Do you know the name of that person?

18 A I don't recall it right now.

19 Q I will tell you a name, you tell me whether you
20 recognize that name. The name Danny Martínez appeal to
21 you regarding the account or the person that is authorized
22 in the account of Damar Management?

23 A Yes.

24 Q Did you know Mr. Danny Martínez?

25 A No.

Crespo
Rodríguez, Inc.

Taquigrafos de Récord

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Cel: (787) 449-1965 (24 horas)

EXHIBIT 9



COOPERATIVA DE AHORRO Y CREDITO
CAGUAS
 APARTADO 1252
 CAGUAS P.R. 00726

A DE DESEMBOLSO
 LINEA DE CREDITO
 TEL: 746-9595

NUMERO DE SOCIO	NOMBRE DEL SOCIO	FECHA	AUTORIZACION
[REDACTED]	José A. Trujillo Melendez	MES 12 DIA 18 AÑO 14	[Signature]
CANTIDAD A CARGARSE A LA LINEA DE CREDITO ARRIBA VENCIONADA			
cuatrocientos cincuenta — 00/100			450.00
INICIALES CAJERO [Signature]	NUMERO DE SEGURO SOCIAL [REDACTED]		
AUTORIZO SE CARGUE A MI LINEA DE CREDITO EL IMPORTE AQUÍ ESTIPULADO			
FIRMA DEL SOCIO			

SOCIO: PROTEGE TU CREDITO. PAGA PUNTUALMENTE TUS OBLIGACIONES

HOJA DE DESEMBOLSO LINEA DE CREDITO



Depósito a Cuenta de Cheques

CAGUAS COOP

P.O. Box 1252 • Caguas, P.R. 00726
 Tel. 746-9595

Efectivo Cash

Fecha 12-18-14

Cheques/Checks

Nombre José A. Trujillo Melendez

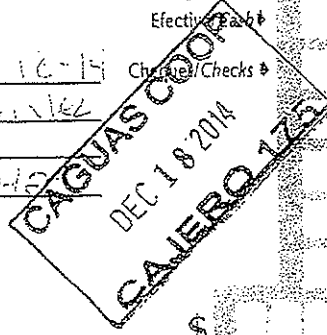
Dirección Caguas, P.R.

Zip 00726

Número de Cuenta / Account Number

Número de Socio

[REDACTED]



\$

450.00



COOPERA DE AHORRO Y CREDITO
CAGUAS
 APARTADO 1252
 CAGUAS P.R. 00726

A DE DESEMBOLSO
 LINEA DE CREDITO
 TEL 746-9595

HOJA DE DESEMBOLSO LINEA DE CREDITO

NUMERO DE SOCIO		NOMBRE DEL SOCIO		FECHA		AUTORIZACION	
[REDACTED]		[REDACTED]		MES DIA AÑO DEC 04 2017		[REDACTED]	
CANTIDAD A CARGARSE A LA LINEA DE CREDITO ARRIBA MENCIONADA							
[REDACTED]		[REDACTED]		[REDACTED]		60.00	
INICIALES CAJERO		NUMERO DE SEGURO SOCIAL		[REDACTED]		9913	
AUTORIZO SE CARGUE A MI LINEA DE CREDITO EL IMPORTE AQUI ESTIPULADO				FIRMA DEL SOCIO [Signature]			

SOCIO: PROTEGE TU CREDITO. PAGA PUNTUALMENTE TUS OBLIGACIONES



COOPER DE AHORRO Y CREDITO
CAGUAS
 APARTADO 1252
 CAGUAS P.R. 00726

Caguas Coop.

CAJA DE DESEMBOLSO
 LINEA DE CREDITO
 TEL. 746-9595

DEC 02 2014

4-C

NUMERO DE SOCIO		NOMBRE DEL SOCIO		FECHA		AUTORIZACION
[REDACTED]		[REDACTED]		12	15	2014
CANTIDAD A CARGARSE A LA LINEA DE CREDITO ARRIBA MENCIONADA						
[REDACTED]						
INICIALES CAJERO	NUMERO DE SEGURO SOCIAL		[REDACTED]			
	AUTORIZO SE CARGUE A MI LINEA DE CREDITO EL IMPORTE AQUI ESTIPULADO		[REDACTED]			
			FIRMA DEL SOCIO			
SOCIO: PROTEGE TU CREDITO. PAGA PUNTUALMENTE TUS OBLIGACIONES						

HOJA DE DESEMBOLSO LINEA DE CREDITO



COOPERATIVA DE AHORRO Y CREDITO
CAGUA
 APARTADO 1252
 CAGUAS P.R. 00726

FONDA DE DESEMBOLSO
 LINEA DE CREDITO
 TEL 746-9595

FOJA DE DESEMBOLSO LINEA DE CREDITO

NUMERO DE SOCIO		NOMBRE DEL SOCIO		FECHA			AUTORIZACION
[REDACTED]		[REDACTED]		MES	DIA	AÑO	
[REDACTED]		[REDACTED]		[REDACTED]			[REDACTED]
CANTIDAD A CARGARSE A LA LINEA DE CREDITO ARRIBA MENCIONADA							
[REDACTED]		[REDACTED]		[REDACTED]			[REDACTED]
INICIALES CAJERO	NUMERO DE SEGURO SOCIAL						
[REDACTED]	[REDACTED]						
AUTORIZO SE CARGUE A MI LINEA DE CREDITO EL IMPORTE AQUI ESTIPULADO				FIRMA DEL SOCIO			
[REDACTED]				[REDACTED]			
SOCIO: PROTEGE TU CREDITO. PAGA PUNTUALMENTE TUS OBLIGACIONES							



COOPERATIVA DE AHORRO Y CREDITO
CAGUAS
 APARTADO 1252
 CAGUAS P.R. 00726

CAJA DE DESEMBOLSO
 LINEA DE CREDITO
 TEL. 746-9595

NUMERO DE SOCIO	NOMBRE DEL SOCIO	FECHA	AUTORIZACION
[REDACTED]	[REDACTED]	MES DIA AÑO [REDACTED]	[REDACTED]
CANTIDAD A CARGARSE A LA LINEA DE CREDITO ARRIBA MENCIONADA		SEP 1 8 2017	1000
INICIALES CAJERO [REDACTED]	NUMERO DE SEGURO SOCIAL [REDACTED]	[REDACTED]	
AUTORIZO SE CARGUE A MI LINEA DE CREDITO EL IMPORTE AQUI ESTIPULADO		FIRMA DEL SOCIO [REDACTED]	
SOCIO: PROTEGE TU CREDITO. PAGA PUNTUALMENTE TUS OBLIGACIONES			

HOJA DE DESEMBOLSO LINEA DE CREDITO



COOPERATIVA DE AHORRO Y CREDITO
CAGUA
APARTADO 1252
CAGUAS P.R. 00726

A DE DESEMBOLSO
LINEA DE CREDITO
TEL 746-9595

HOJA DE DESEMBOLSO LINEA DE CREDITO

NUMERO DE SOCIO	NOMBRE DEL SOCIO	FECHA	AUTORIZACION
[REDACTED]	JOSÉ GARCÍA	MES: 07 DÍA: 18 AÑO: 2017	[Signature]
CANTIDAD A CARGARSE A LA LINEA DE CREDITO ARRIBA MENCIONADA			
CASH / Cash — 00/00			1000.00
INICIALES CAJERO	NUMERO DE SEGURO SOCIAL		
AUTORIZO SE CARGUE A MI LINEA DE CREDITO EL IMPORTE AQUI ESTIPULADO		FIRMA DEL SOCIO	
		[Signature]	

SOCIO: PROTEGE TU CREDITO. PAGA PUNTUALMENTE TUS OBLIGACIONES



COOPERATIVA DE AHORRO Y CREDITO

CAGUAS

APARTADO 1252

CAGUAS P.R. 00726

 HOJA DE DESEMBOLSO
 LINEA DE CREDITO
 TEL. 746-9595

4-4

NUMERO DE SOCIO		NOMBRE DEL SOCIO		FECHA			AUTORIZACION
[REDACTED]		[REDACTED]		MES	DIA	AÑO	
CANTIDAD A CARGARSE A LA LINEA DE CREDITO ARRIBA MENCIONADA		[REDACTED]		7/10/14			
INICIALES GAFERO		NUMERO DE SEGURO SOCIAL		[REDACTED]			2500.00
JUL 1 2014		AUTORIZO SE CARGUE A MI LINEA DE CREDITO EL IMPORTE ACORDADO		[REDACTED]			99/13
		FIRMA DEL SOCIO		[REDACTED]			
SOCIO PROTEGE TU CREDITO. PAGA PUNTUALMENTE TUS OBLIGACIONES							

HOJA DE DESEMBOLSO LINEA DE CREDITO

EXHIBIT 10

1 credit unions Human Resources director and/or employees?
2 Or it applies to any Human Resources director or
3 employees?

4 A Only credit unions.

5 Q Okay, when you began to work for the
6 Cooperativa de Credito de Caguas in the year 2011, what
7 was your first position there?

8 A Only the vice president of finance.

9 Q And later, what position were you appointed
10 to?

11 A Then it was added the duties of Human
12 Resources, because that position was empty.

13 MR. SÁNCHEZ:

14 I think that the answer was "that the position
15 became empty or vacant."

16 THE INTERPRETER:

17 Correction to the translation.

18 BY MR. SÁNCHEZ:

19 Q And what -- at the present, what is your
20 position?

21 A Vice president of Finance and Human Resources.

22 Q Therefore, I must -- would it be fair to say
23 that when the position of Finance V.P. was added the
24 duties of Human Resources, you have continued in that
25 same position up to the present.

1 that you should verify the "Visuales" system?

2 A I don't recall that.

3 Q Okay. Do you know whether you, or Mr. Ramón
4 Adorno, or any other person verified whether Ms. Daumont
5 was an authorized person in Mr. José Tirado's account,
6 in the Visuales system?

7 A I understand that they were going through that
8 process.

9 Q But do you know whether they made the
10 verification?

11 A They should have. I recall seeing a document.
12 I could take under consideration, in this situation,
13 because the credit line don't have any document where
14 they give somebody else an authorization. I understand
15 that credit lines do not have that consideration.

16 Q You are stating that a withdrawal from a
17 credit line is the same as a loan?

18 A It's a loan, because everything that is
19 withdrawn from the credit line, is going to advance, and
20 it would increase the amount to be paid.

21 Q Therefore, when you do a withdrawal from a
22 credit line, you apply all the procedures that are
23 related to a loan? Is that what you're saying?

24 A A credit line works the same as a credit card.
25 The amount that you withdraw and use should be the

EXHIBIT 11

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

WANDA E. DAUMONT COLÓN

Plaintiff

Vs.

COOPERATIVA DE AHORRO Y CRÉDITO
DE CAGUAS; IRMA HILERIO ARROYO AS
OFFICER AND IN HER PERSONAL
CAPACITY

Defendants

* CIVIL NO.: 15-3120

*

*

*

* AGE DISCRIMINATION IN
* EMPLOYMENT ACT (ADEA);

* PUERTO RICO LAW 100,

* 29 L.P.R.A., 146, LAW

* 80, 29 L.P.R.A., S 185

*

*

*

DEPOSITION OF MRS. IRMA HILERIO ARROYO

DATE : February 8th, 2017

TIME: : 10:06 A.M.

CLIENT : ALDARONDO-GIRALD LAW PSC
Esquire Building
2 Vela Street
Suite 701
San Juan, Puerto Rico

APPEARANCES

FOR PLAINTIFF:

Ericson Sánchez Preks, Esq.

FOR DEFENDANTS:

Enrique José Mendoza Méndez, Esq.

NOTARY PUBLIC:

Ericson Sánchez Preks, Esq.

Crespo
Rodríguez, Inc.

Taquígrafos de Récord

PO Box 29062 San Juan, Puerto Rico 00929-0002
Tel. (787) 706-5930, Fax: (787) 706-8217, Cel. (787) 449-1965 (24 horas)
www.cresporodriguez.com " e-mail: crespoyrodriguez@hotmail.com

1 the breaks, and I now clearly state that Ms. Hilerio
2 should answer every question that I pose verbally. So
3 you have to state it verbally. You cannot make gestures
4 or signs to answer the questions, since gestures and
5 signs cannot be recorded. Did you understand that?

6 THE DEPONENT:

7 Yes, I understand.

8 MR. SÁNCHEZ:

9 Perfect.

10 DIRECT EXAMINATION

11 BY MR. SÁNCHEZ:

12 Q Okay, Ms. Hilerio, I want you to state for the
13 record your full name again.

14 A My name is Irma Hilerio Arroyo.

15 Q Ms. Hilerio, have you taken any medication
16 during this day that can affect the comprehension or
17 understanding of the questions, or the answer that you
18 should provide?

19 A No, I do not take medications.

20 Q Okay. I must understand that, at the present,
21 you are in full capacity to answer the questions.

22 A I think so.

23 Q Okay. Ms. Hilerio, what is your age?

24 A I am 64 years old.

25 Q When were you born?

Crespo
Rodríguez, Inc.
Taquígrafos de Récord

www.cresporodriguez.com
Cal. (707) 440-1065 (24 Lines)

1 Yes, I did.

2 MR. MENDOZA:

3 Okay.

4 BY MR. SÁNCHEZ:

5 Q Okay. So, to the best of -- according to your
6 answer, you were never told or informed that the
7 transaction was a withdrawal from a credit line, and at
8 the same time, it was deposited, the same amount, in the
9 account, one of the accounts of the same client. Just
10 to be sure.

11 MR. MENDOZA:

12 I have an objection to the translation--

13 MR. SÁNCHEZ:

14 Okay.

15 MR. MENDOZA:

16 --because you said that she was never informed,
17 that she has testified that she was never informed. And
18 that was your question. But the translation did not
19 mention that she never informed about that; the
20 translation was that she was not informed. Which makes
21 a difference.

22 MR. SÁNCHEZ:

23 Okay.

24 MR. MENDOZA:

25 So what I suggest is--

EXHIBIT 12

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

WANDA E. DAUMONT COLÓN

Plaintiff

vs.

COOPERATIVA DE AHORRO Y CRÉDITO
DE CAGUAS; IRMA HILERIO ARROYO
AS OFFICER AND IN HER PERSONAL
CAPACITY

Defendants

* CIVIL NO.: 15-3120 (GAG-CVR)

*

*

* AGE DISCRIMINATION IN

* EMPLOYMENT ACT (ADEA),

* PUERTO RICO LAW 100, 29

* L.P.R.A., 146, LAW 80, 29

* L.P.R.A., 185

*

* JURY TRIAL REQUESTED

*

*

*

DEPOSITION OF MS. IRMA HILERIO ARROYO
(CONTINUATION)

DATE : July 26, 2017

TIME : 9:42 a.m.

CLIENT : ALDARONDO-GIRALD LAW PSC

ADDRESS : 2 Vela Street, Esquire Building
Seventh Floor, suite 701
San Juan, Puerto Rico

APPEARANCES

FOR PLAINTIFF:

Ericson Sánchez Preks, Esq.

FOR DEFENDANTS:

Enrique José Mendoza Méndez, Esq.

Otto Y. Müller Vázquez, Esq.

NOTARY PUBLIC:

Ericson Sánchez Preks, Esq.

1 Coop?

2 A Well, the Credit Union has about 17,000 clients.
3 I would hope that a manager would know at least those that
4 important, that come frequently, but I don't expect them
5 to know everybody, because it would be impossible.

6 Q Okay. In the case of Ms. Wanda Daumont
7 termination or discharge, was his (sic) case or his (sic)
8 dismissal, discharge, or termination, whatever you can
9 call that process, was referred to any superior process at
10 the administrative agency's level, meaning for example,
11 COSSEC?

12 A No.

13 Q So, I must understand from your answer that Ms.
14 Wanda Daumont's termination and obviously the reason the
15 Coop alleged she was terminated for, remain at your level?

16 A That's correct.

17 Q Okay. And, going back to the two main reasons
18 for Ms. Wanda Daumont's termination, the transactions, the
19 two transactions that were related to her termination,
20 just to clarify, because I think that was not covered in
21 the last deposition. To the best of your knowledge at the
22 present, the transaction related to Damar Development and
23 Management Corporation, which was related to the process
24 of several manager checks, was that transaction cause any
25 loss to the Coop?

1 A Like I said the last time, when asked. The main
2 reason of Mrs. Daumont's dismissal was having signed a
3 document with a name that wasn't hers. Neither of the two
4 cases, neither Damar or this one, caused any monies to the
5 Credit Union. The fact with Damar's case was that there
6 was a non-compliance with the procedures and that's what
7 brought to the dismissal.

8 MR. MENDOZA:

9 No, "...that was why it was included in the letter."

10 DEPONENT:

11 In the letter.

12 INTERPRETER:

13 Interpreter stands corrected. "And, that's why it
14 was included in the letter."

15 MR. SÁNCHEZ:

16 Q Okay, so... okay, therefore, as just stated,
17 there was no loss in any of the two situations for the
18 Coop?

19 A No, it was a trust factor.

20 Q Okay. In addition to that, was any kind of
21 complaint from anyone filed against the Coop, because of
22 any of those two situations, those two events that you
23 just mentioned?

24 A Well, there was complaint filed by Mrs. Daumont
25 in the Labor Department.

1 Q Yes, that's correct, but what I was trying to
2 clarify is, whether there was any complaint from anyone
3 against the Coop, because the transactions in fact,
4 because she processed that, any of those two transactions?

5 A Before me, I have not seen them.

6 Q Okay. Have you, anyone in the Coop or in the
7 Board of Directors has mentioned to you anything that,
8 some kind of complaint have arrived to the Coop against
9 the Coop, because Ms. Daumont processed any of those two
10 transactions, apart from Ms. Daumont's complaint?

11 A No.

12 Q Okay. From those answer, the last and the
13 previous one, I must understand that the Credit Union has
14 suffered no damages from the events that led to Ms. Wanda
15 Daumont's termination.

16 A If that would been the case, I would have
17 included it in her letter.

18 Q Okay. I don't have any other questions.

19 CROSS EXAMINATION

20 BY MR. MENDOZA:

21 Q Enrique José Mendoza Méndez, very briefly, the
22 decision to terminate Mrs. Daumont was yours?

23 A Yes, it was mine after having met with my staff,
24 yes, it was mine.

25 Q In what measure Mrs. Daumont's age was or not a

1 factor in your decision to terminate her?

2 A Never can age be one, because I am older than
3 her.

4 Q Okay, I have no further questions at this time,
5 Counselor.

6 RE-DIRECT EXAMINATION

7 BY MR. SÁNCHEZ:

8 Q Regarding that last answer you provided to
9 Attorney Mendoza, isn't it a fact that the day that Ms.
10 Wanda Daumont was terminated in the meeting you had with
11 her and which Mr. Ramón Adorno, I think is his name, was
12 present as a witness, isn't it a fact that Ms. Wanda
13 Daumont told you that she was being terminated, because of
14 her age?

15 A No, she stood up with the letter in her hand,
16 and she mentioned that she knew from the beginning that I
17 was going to dismiss, but she did not mention anything
18 about her age.

19 Q Okay, no further questions.

20 MR. MENDOZA:

21 Okay, we have no questions.

22 MR. SÁNCHEZ:

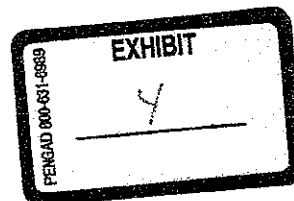
23 Therefore I think it's at 10:16 in the morning and
24 the deposition is concluded. I want to thank Ms. Irma
25 Hilerio for taking the time to take, you take, or you took

EXHIBIT 13

Exhibit 27



COOPERATIVA DE AHORRO Y CREDITO DE CAGUAS

Solicitud de Instrumentos Monetarios

01-30-15 Realizado por (Firma Cajero): BYP
 Cuenta: \$ [REDACTED] Efectivo: \$ [REDACTED] Cheques: \$ 18,795.43
 e Instrumento: Cheque de Gerente ☒ Giro [REDACTED]

PERSONA QUE REALIZA LA TRANSACCION EN LA COOPERATIVA

re: Maria T. Ayala De Martinel Número Cuenta: [REDACTED]
 o Social o Id Extranjero: [REDACTED] Núm. Telefono: 787-745-3333
 ión Fisica: Valles del Lago Caonillas 1015 Caguas, PR
00725
 Nacimiento: 10-31-1949
 le Identificación: LIC Número Id: 1208804
 de Vencimiento: 10-31-2015 Pais de Emisión: PR
 o o Profesión: Administradora Agencia Seguros
Danny Martinez

PERSONA O ENTIDAD PARA LA CUAL SE REALIZA LA TRANSACCION (Remitente)

re: Damart Development and Management Corp Número Cuenta: [REDACTED]
 ro Social o Id Extranjero: [REDACTED] Núm. Telefono: 787-745-3333
 ión Fisica: Urb. Valle Del Lago Caonillas 1015
Caguas PR, 00725

a Nacimiento [REDACTED] Empleo o Profesión: [REDACTED]

DESGLOSE DE LA TRANSACCION				Sello Cajero
Por de	Cantidad	Comision	Total	
retario De Hacienda	\$ 2,670.58	\$ 8.00	\$ 2,678.58	
retario De Hacienda	418.06	8.00	426.06	
retario De Hacienda	6,700.36	8.00	6,708.36	
retario De Hacienda	2,670.58	8.00	2,678.58	
retario De Hacienda	418.06	8.00	426.06	
retario De Hacienda	5,867.79	8.00	5,875.79	
	\$ 18,747.43	\$ 48.00	\$ 18,795.43	

ia del Comprador: [Signature]

Autorizado por: [Signature]

Revisado: 1/1/17

EXHIBIT 14

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

WANDA DAUMONT COLÓN

Plaintiff

v.

COOPERATIVA DE AHORRO Y
CRÉDITO DE CAGUAS

Defendants

CIVIL NO.: 15-3120

AGE DISCRIMINATION

TAKING OF DEPOSITION OF MR. DAMIAN D. MARTÍNEZ-VÁZQUEZ

DATE : April 27, 2017
TIME : 2:38 p.m.
OFFICE : MENDOZA LAW OFFICES
ADDRESS : Centro de Seguros Building, Suite 312
701 Ponce de Leon Avenue
San Juan, Puerto Rico

APPEARANCES

ON BEHALF OF PLAINTIFFS:

Erickson Sánchez-Preks, Esq.

ON BEHALF OF DEFENDANTS:

Enrique J. Mendoza-Méndez, Esq.
Otto Muller-Vázquez, Esq.

1 testifies through the Interpreter as follows:

2 DIRECT EXAMINATION

3 BY MR. MENDOZA:

4 Q Certainly you are married?

5 DEPONENT:

6 A Yes.

7 Q And you're married to Mrs. María Ayala de
8 Martínez?

9 A Right.

10 Q Okay. In general terms, what does Damart
11 Development Management, Corp. does? Just in general terms.

12 A Is a family corporation where I have my
13 properties in that corporation.

14 Q And is a company duly registered with the State
15 Department and authorized to do business in Puerto Rico?

16 A Yes.

17 Q Since when, more or less?

18 A More or less fourteen years.

19 Q Okay. I'm going to show you what has... what was
20 marked as Exhibit 1 for the deposition of Mrs. Ayala.
21 Please, examine the document and tell us when you have
22 done so. .

23 A Okay.

24 Q That's the register of your authorized signature
25 as a representative of Damart Development and Management,

1 Corp. in the account of Caguas Coop. Correct?

2 A Correct.

3 Q Very well. I'm going to show you Exhibit 2. And
4 please let me know when you have examined the document.

5 A Okay.

6 Q And this is your signature in that document?

7 A Yes.

8 Q Okay. I'm showing you what was marked as Exhibit
9 3 of the deposition of Mrs. Ayala.

10 Please examine it, and the question will be whether
11 that is your signature?

12 A Yes, that's my signature.

13 Q Okay. And this document was marked as Exhibit 5
14 of Mrs. Ayala's deposition and I ask you to examine it and
15 tell me whether that is your signature?

16 A Yes, that's my signature.

17 Q Can you explain to us, please, the circumstances
18 in which you prepared that document which has been marked
19 as Exhibit 5?

20 A Okay. I was having some transaction with my CPA,
21 because there was a "amnistía".

22 Q Okay. We have been using amnesty.

23 A Amnesty, okay.

24 Q When the interpreter was here, so lets take it
25 for good.

1 A Okay. It was the last day of Secretario de
2 Hacienda for an amnesty to retired, like, I was pay a less
3 amount of tax authorized by the law. And then I had to go
4 to the CPA, which was in Martínez Nadal.

5 I knew that it would take some time so I went to
6 Wanda Damount and I told her that I had urgency to do this
7 and I wanted her to know that if she could prepare a check
8 as soon as I called. She told me that she could not do it
9 because it was not authorized, that why she needed to...
10 that I had to sign a document authorizing my wife, María
11 Ayala, for her to obtain those, the checks. Just in case
12 I was late coming back from the CPA, because I knew it
13 would take some time. And, so I went to her and then I
14 filled out this document for her to know that just in case
15 I could not make it in time for her to prepare a check and
16 to take it to my wife. So that's what the purpose of this
17 document.

18 MR. SÁNCHEZ:

19 Just to be sure, the document that he has mentioned
20 is the one that we have been identified as Exhibit 5?

21 MR. MENDOZA:

22 Five. Yes, yes.

23 Q The question was, what were the circumstances
24 for issuing that document. Was that document tendered by
25 you personally, was in fax, in mail, how you?

1 DEPONENT:

2 A I went personally to her office and it was in
3 the hours of the morning before noon.

4 Q Very well.

5 A So, I went over there and then she told me that
6 I must sign this document.

7 Q Oh. And the tax payer or tax payers who would
8 benefit from the amnesty, was it the corporation or
9 whether it was you and/or your wife in your personal
10 character as a tax payer?

11 A A tax payer is, under my circumstances, person,
12 my, the retirement funds that I had.

13 Q Okay. So, what I'm trying to get at, it was not
14 taxes related to Damart Development Management Corp., it
15 was taxes relate... taxes issues related to you as a
16 personal tax payer?

17 A That's correct.

18 Q Okay. I'm going to show what was marked as
19 Exhibit 6 of deposition.

20 This deposition it says a request or application for
21 an account, and my question would be, for you to examine,
22 to tell me when you have done so, and whether that's your
23 signature.

24 A This is my signature. This is my signature.

25 Q Okay, very well. And I'm going to show you what

1 has been marked as Exhibit 4. Please examine it, and when
2 you have done so, my question is, whether it is your
3 wife's signature at that document.

4 A Yes. That is my wife's signature in the
5 document. Yes.

6 Q Okay. Aside from the authorization, or hand
7 written authorization, that you signed, which is Exhibit
8 5 of this deposition, was there a corporate resolution
9 issued by Damart Development and Management, Corp., for
10 this transactions related to the checks that were going to
11 be issued to the Secretary of the Treasury for the
12 amnesty?

13 A No.

14 MR. MENDOZA:

15 Okay. Thank you Mr. Martínez. Those are my questions.

16 DEPONENT:

17 Okay.

18 MR. MENDOZA:

19 Counselor, do you have any questions?

20 MR. SÁNCHEZ:

21 Can we go off the record for a moment?

22 MR. MENDOZA:

23 Yes. No problem.

24 OFF THE RECORD

25

EXHIBIT 15



Exhibit 30

COOPERATIVA ANDRÉS B. CALDERO
CAGUAS

Fecha 12-11-13

TARJETA DE FIRMAS ☐ Cuenta Corriente ☐ Certificados Ahorros ☐ Cuenta Corriente ☐ Otras
☐ Cuenta de Ahorros ☐ Xmas Club ☐ Ahorros Especiales

ulo de la Cuenta Public Development And Management

Dirección Postal Corp

La cuenta para la cual se suministró(n) la(s) forma(s) que sigue(n) queda sujeta a todos los términos y condiciones de los acuerdos en el Convenio de Cuenta, respecto a la fecha de la apertura de la cuenta y a los que subsiguientemente se adopten por la Cooperativa. Asimismo, además, que se me ha informado por un representante de la Cooperativa que copia íntegra de dicho convenio se encuentra fijada en el Tablon de Edictos y que, de él, fácilmente, se me suministrará copia íntegra de dicho convenio.

Firmes ☐
Requiere ☐

[illegible]

NUMERO DE FIRMAS REGISTRADAS ☐

Firma del Oficial de la Cooperativa

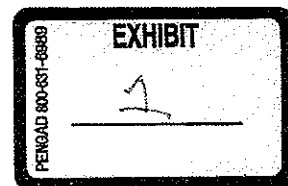
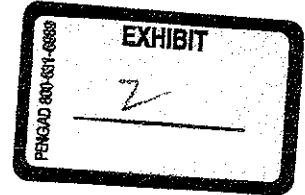


Exhibit 29



CONVENIO DE CUENTA CONJUNTA



Tipo de cuenta: ☐ Mancomunada (y): ☒ Solidaria (y/o):

Nombre de la Cuenta: CORR COMER

Número: XXXXXXXXXX

En consideración a la aceptación de parte de la Cooperativa de nuestra cuenta conjunta, según el tipo indicado anteriormente, y de la aceptación de cuando en cuando de los depósitos que hagamos a la misma, nosotros, los abajo suscribientes, por la presente convenimos:

1. Que nuestra intención es la de que la cuenta arriba indicada opere a nombre de todos nosotros de forma conjunta.
2. Que este convenio es suplementario a los reglamentos, al Convenio de Cuenta Corriente, y a todos los demás formularios y convenios que en relación con dicha cuenta sean suscritos con la Cooperativa.
3. Que todos los fondos que los suscribientes tengan o puedan tener en dicha cuenta serán de la propiedad de los suscribientes conjuntamente y podrán ser retirados de la siguiente forma:
 - a. Por la firma de todos nosotros, si la cuenta es mancomunada, o
 - b. Por la firma de cualquiera de nosotros, si la cuenta es solidaria
4. Que la Cooperativa puede honrar cualquier requerimiento de retiro o cualquier orden para el pago de los fondos en dicha cuenta, que esté liberada de acuerdo a lo dispuesto en este convenio.
5. Que la Cooperativa podrá acreditar a dicha cuenta cualquier instrumento negociable, giro, cheque y orden de pago, que sea depositada en dicha cuenta, siempre y cuando tal instrumento esté endosado a favor de cualquiera, o de todos los suscribientes.
6. Que cualquiera de los suscribientes pueden endosar para depósito y depositar en esta cuenta: cheques, giros, instrumentos negociables, y órdenes de pago, pertenecientes o pagaderos a cualquiera de los suscribientes, o a todos en conjunto; y los endosos para depósito se harán por escrito, por sello de goma, o en alguna otra forma sin indicar la persona que endosa.
7. Que la Cooperativa en la tramitación de las operaciones de esta cuenta, retiros, depósitos, endosos y cobros de partidas depositadas, actuará y honrará las instrucciones de los suscribientes de acuerdo a lo dispuesto en este convenio.
8. Que a la muerte de alguno de los depositantes, los depositantes que sobrevivan, no tratarán de hacer retiros de dicha cuenta, ni libramientos, excepto según lo disponen las leyes vigentes; y notificarán inmediatamente a la Cooperativa de tal fallecimiento.

Firmado hoy 11 de diciembre de 2013

POR LOS DEPOSITANTES:

ACEPTADO POR LA COOPERATIVA:

Damar Development and Management Corp
Firma del Socio

[Signature]
Firma Oficial de la Cooperativa

✓ [Signature]
Firma Persona Autorizada

EXHIBIT 16

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

WANDA DAUMONT COLÓN

Plaintiff

v.

COOPERATIVA DE AHORRO Y
CRÉDITO DE CAGUAS

Defendants

CIVIL NO.: 15-3120

AGE DISCRIMINATION

TAKING OF DEPOSITION OF MRS. MARÍA T. AYALA-TORRES

DATE : April 27, 2017
TIME : 1:52 p.m.
OFFICE : MENDOZA LAW OFFICES
ADDRESS : Centro de Seguros Building, Suite 312
701 Ponce de Leon Avenue
San Juan, Puerto Rico

APPEARANCES

ON BEHALF OF PLAINTIFFS:

Erickson Sánchez-Preks, Esq.

ON BEHALF OF DEFENDANTS:

Enrique J. Mendoza-Méndez, Esq.
Otto Muller-Vázquez, Esq.

1 MR. SÁNCHEZ:

2 Oh, you just said two.

3 MR. MENDOZA:

4 I stand corrected. Thank you.

5 Q Please, examine the document and let me know
6 when you have done so.

7 DEPONENT:

8 A Yes.

9 Q Very well. Can you identify that document?

10 A It's for an account at the Cooperativa Ahorro
11 and Crédito, the credit union.

12 Q Whose signature is that?

13 A My husband's, Damián Martínez Vázquez.

14 Q Your signature is not authorized in Damart
15 Development and Management Corp. account, at Caguas Coop.

16 A It's not authorized.

17 Q Okay. Thank you. Do you know Mrs. Wanda Daumont?

18 A Yes.

19 Q Since when?

20 A We've been members of the credit union for over
21 twenty years so ever since we've been... are members she's
22 been there, as an employee.

23 Q Aside from your relationship with Mrs. Daumont,
24 because she... she was related to Caguas Coop and you are
25 a member there, do you share with her or meet with her

1 outside of the Caguas Coop scenario?

2 A No, sir.

3 Q Can you mark these documents as Exhibit 2? I'm
4 showing counsel and yourself what has been marked as
5 Exhibit 2 of this deposition. Please examine the document.
6 Let us know when you have done so. Very well. Can you
7 identify the document, please?

8 A It's an agreement of a joint account.

9 Q For Damart Development and Management Corp.
10 Correct?

11 A Yes, sir.

12 Q And where it says, "Signature of authorized
13 person", whose signature is that?

14 A My husband, Damián Martínez.

15 Q Okay. Thank you. Please, mark this as Exhibit 3
16 of this deposition.

17 I'm showing counsel or... and deponent what has been
18 marked as Exhibit 3 of this deposition. Please, examine
19 what has been marked as Exhibit 3 and let us know when you
20 have done so. Very well. Can you identify the document,
21 please?

22 A It's the people that are authorized for the
23 transactions on that account.

24 Q That's the account of Damart Development and
25 Management, Corp. Correct?

1 A Yes, sir.

2 Q And whose signature is it there as authorized
3 person for Damart Development and Management Corp?

4 A My husband, Damián Martínez Vázquez.

5 MR. SÁNCHEZ:

6 She said to the translation "My husband", I think.

7 INTERPRETER:

8 I thought I said "my husband", "mi esposo", my
9 husband", I think that I said it.

10 MR. MENDOZA:

11 That's okay. She said it and it's clarified now that
12 she did.

13 Q As far as doing banking transactions in Caguas
14 Coop for the benefit of Damart Development and Management,
15 Corp., which are those that you do?

16 DEPONENT:

17 A Me, none.

18 Q Okay. I'm showing counsel and deponent what has
19 been marked as Exhibit 4 of this deposition.

20 Please, examine what has been marked as Exhibit 4 and
21 let us know when you have done so. Very well. Can you
22 identify the document, please?

23 A It's an authorization to be able to make a
24 transaction to the account... on the account.

1 Q And this is a transaction that was done in
2 January 31st, 2015. Correct?

3 A That's correct.

4 Q And the person who is identified in this
5 document as having done the transaction in the credit
6 union is who?

7 A My signature is there, María Teresa Ayala.

8 Q And this transaction was done on behalf of
9 Damart Development Management, Corp. Correct?

10 A Yes, sir.

11 Q Can you explain to us, what was the detail of
12 said transaction in that date?

13 A Looking at the date that's January 31st, it's
14 the last... it was the last day in order to... be able to
15 getting amnesty.

16 Q When you say the last day, for who to get the
17 benefit of the amnesty?

18 A For us, my husband and I. It was the last day
19 that we could save a lot of money if we paid what the
20 accountant told us.

21 Q I understand, Mrs. Ayala, that the transaction
22 was done in order to get the benefit of an amnesty.
23 Correct?

24 A Yes, sir.

25 Q And if you did that transaction within the time

EXHIBIT 17

Exhibit 28



Nombre: DAMART DEVELOPMENT AND MANGEMENT CORP

Caguas Coop Central ☒
 Caguas Coop Pueblo ☐

Solicitud de Autorización de Personas a Realizar Transacciones

Yo, DAMART DEVELOPMENT AND MANGEMENT CORP autorizo a la siguiente(s) persona(s) en la cuenta

de CHEQUES COMERCIAL con el número de cuenta [REDACTED] en el día de hoy 11 de diciembre de 2013.

Informo además, que de entender necesario el realizar algún cambio de firma(s) autorizada(s) tengo la obligación de visitar la Cooperativa de Caguas Coop para enmendar nuevamente la autorización de firma o firmas en mi cuenta [REDACTED].

Menciono que la(s) persona(s) autorizada(s) con dirección postal: * PO BOX 386 CAGUAS PR 007250000 y la dirección física: VALLES DEL LAGO CALLE CAONILLA #1015 CAGUAS PR, PR 007260000 con el número de teléfono: (787)-675-3333 y su identificación es el número: 492343 que corresponde a la identificación de: Licencia.

☒ Autorizo a que se le provea información por teléfono del balance actual de la cuenta antes mencionada a la(s) persona(s) aquí autorizada(s). Esta autorización revoca el inciso (1) del documento Autorización para Proveer Información Financiera por Teléfono.

Firmando hoy 11 de diciembre de 2013 en Caguas Coop.

DAMART DEVELOPMENT AND
MANGEMENT CORP

Firma Dueño Cuenta

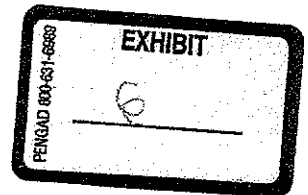
DAMIAN MARTINEZ VAZQUEZ

Persona Autorizada

EXHIBIT 18

Exhibit 26

CAGUAS COOP



SOLICITUD DE CUENTA-INGRESO

to a la disposiciones de las Cláusulas de Incorporación, al Reglamento y a las enmiendas a dichas Cláusulas y Reglamentos, de CAGUAS COOP,
to la apertura de la(s) siguiente(s) cuenta(s):

Acciones (socio) ☐ Certificado de Depósitos(CD) ☐ Vera Coop ☐ Planilla Coop ☐ DBA
Depósito ☐ Cuenta Corriente (Cheques) ☐ Cuenta MIA ☐ Cuenta ESTILO ☒ Cta. Corriente Com
Tarjeta ATH (Llenar Convenio) ☐ Navi Coop ☐ No Socio ☐ Reingreso ☐ Sin Fines de Lucro

Información del Solicitante					
Nombre: DAMART DEVELOPMENT AND MANGEMENT CORP					
Seg. Soc:		Estado Civil:		Dependientes: 0	
Fecha de Nacimiento:	ID: REGISTRO CORP	Emisión: PR	Fecha Expiración:	Distrito: 01	
Dirección Residencial: 1015 CAONILLAS URB VALLE DEL LAGO CAGUAS 00725-0000			Dirección Postal: PO BOX 386 CAGUAS PR 00726-0000		
Teléfono: (000)-000-0000			Tel. Cel: (000)-000-0000		
Lugar de Trabajo: Ocupación: CORPORACION			Teléfono de Trabajo:		Ingreso: \$0.00
Ext: Supervisor:					

Información de Persona Autorizada					
Nombre: DAMIAN MARTINEZ VAZQUEZ		Sexo: M	Seg. Soc:	Estado Civil: CASADO	Dependientes: 0
Fecha de Nacimiento: 10/14/1949	ID: Licencia	Emisión: PR	Expiración: 10/13/2014	Relación con Solicitante: FIRMA AUTORIZADA	
Dirección Residencial: ALLES DEL LAGO CALLE CAONILLA #1015 CAGUAS PR,PR 00726-0000			Dirección Postal: * PO BOX 386 CAGUAS PR 00725-0000		
Teléfono: (787)-675-3333			Teléfono Celular: (787)-675-3333		
Lugar de Trabajo: SEGUROS DANNY MARTINEZ		Teléfono de Trabajo: (787)-746-2333		Ingreso Mensual: \$18,495.84	
Ocupación: Agente de Seguros		Ext: Supervisor:			
Deseo autorizar a otras personas a realizar transacciones bajo esta cuenta: <input type="radio"/> Si (Llenar Anejo-A) <input checked="" type="radio"/> No					

Firma Solicitante

11 de diciembre de 2013

Fecha

Firma Co-Solicitante

11 de diciembre de 2013

Fecha

Número de cuenta

Número de cuenta de cheques

PARA USO DE LA COOPERATIVA

CUENTA NUEVA Clasificación: H SUCURSAL: 02 OFAC REVISADO POR: (Inicial)

D TO INICIAL 25.000.00 ☐ CHEQUE ☐ EFECTIVO ☒ OTRO: XFER 331983

ADO POR: MADELINE TORRES SANTOS FECHA (dd-mm-aa): 11/DIC/2013

REVISADO POR: FECHA (dd-mm-aa):

EXHIBIT 19

7-1^{er} Cuanto [REDACTED]

Yo autorizo a Doña Wado Saurant
a que efectue la transaccion de retiro
atraves Maria Ayala.

O O [Signature]

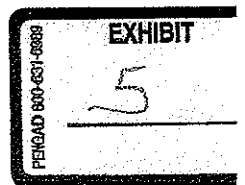


Exhibit 25

ANEJO 25

EXHIBIT 20

Exhibit 5

**CAGUAS COOP***¡Mejor Servicio, más beneficios!*

CAGUAS COOP CENTRAL
Ave. José Gautier Benítez,
Carretera #1 Km 37.5,
Caguas, Puerto Rico
Tel. (787) 286-8500
Fax (787) 258-9550

CAGUAS COOP PUEBLO
Calle Lope Flores,
Esquina Avenida Muñoz Rivera,
Caguas, P.R.
Tel. (787) 746-9595
Fax (787) 744-3620

27 de junio de 2012

Sra. Wanda Daumont
Gerente de Sucursal

El pasado 16 de junio de 2012, usted autorizó el cambio del cheque número 1537021 por la cantidad de \$5,229.74. El mencionado cheque fue emitido por AEELA a la orden de Viviana E. Sola Daumont. Este cheque fue autorizado por usted para cambio, sin tener los fondos necesarios para garantizar la cuantía del cheque y a la vez autorizó una excepción a la norma de retención de fondos.

La señora Viviana E. Sola Daumont es su hija. La Política del Area de Caja prohíbe que los empleados de la Cooperativa puedan autorizar transacciones de familiares; esto para evitar tan siquiera la apariencia de un conflicto de interés. Usted conoce esta política ya que usted trabajo en el diseño de la misma, por lo que se presume que conoce estas normas que se crean para salvaguardar la integridad de todos y para mantener un ambiente de trabajo confiable.

En la reunión que sostuvimos el día 20 de junio de 2012 con la Oficial de Cumplimiento, Jessybel A. Matos usted aceptó que autorizó el mencionado cheque y que acostumbra hacer lo mismo con los cheques de su esposo. Le apercibimos de que esta práctica debe ser suspendida inmediatamente y toda transacción de cualquier familiar que se salga de las normas generales y regulaciones no deben ser aprobadas por usted. Deberá inhibirse de realizar, autorizar u orientar a familiares a estos fines.

Se le apercibe que de ocurrir una situación similar a las descritas anteriormente y conforme a las facultades de imponer medidas disciplinarias, usted podría estar sujeta a medidas que pudieran llegar hasta el despido.

Irma Hilerio Arroyo
Presidenta Ejecutiva

Expediente de Personal

lrf

Lo doy por leído no estoy de acuerdo.
6/29/12

EXHIBIT 21

Exhibi A 7



CAGUAS COOP CENTRAL
Ave. José Gautier Benítez,
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CAGUAS COOP PUEBLO
Calle Lope Flores,
Esquina Avenida Muñoz Rivera,
Caguas, P.R.
Tel. (787) 746-9595
Fax (787) 744-3620

31 de julio de 2012

Sra. Wanda E. Daumont Colón
Gerente Sucursal Pueblo

Estimada señora Daumont:

El día 10 de julio de 2012 me suscribió una carta, la cual recibí el 11 de julio, en la que objeta el uso de la Política de Operación del Área de Caja en relación a la cita que hago de dicha Política en la carta suscrita a usted el 28 de junio de 2012 relacionada con que usted autorizó un cambio de cheques a su hija.

Le suscribo la presente comunicación con el único propósito de aclarar algunos puntos que entiendo hayan podido confundirse: En primer lugar, quisiera aclarar su alegación de que la política existente al momento de los hechos, ocurridos el 16 de junio de 2012, no prohibía el autorizar un cambio de cheque a un familiar, ya que la Política que lo prohíbe es la política enmendada por la Junta con fecha del 20 de junio de 2012.

Debo entonces aclarar que la Política de Operación del Área de Caja a la que hago referencia en la carta del 28 de junio de 2012, es la aprobada el 21 de noviembre de 2011. En el Artículo VI, inciso E, número 8, dice así: "Toda transacción relacionada con su cuenta personal o la de un familiar debe ser trabajada por otra persona, por lo tanto, se prohíbe hacer transacciones en su cuenta personal o de familiares, ya sea en las cuentas con la Cooperativa o externas, las cuales se procesan a través de nuestros sistemas mecanizados como son: AAA, AEE, tarjetas de crédito, líneas de crédito, venta de marbetes, venta de sellos de rentas internas o del Colegio de Ingenieros y celulares, entre otros." El simple hecho de indicar en la misma la palabra "toda transacción" incluye una autorización realizada por usted relacionada con la cuenta de un familiar. (énfasis nuestro)

Según se desprende de esa sección, todo empleado de la Cooperativa tiene la prohibición de participar en cualquier transacción en la que el socio o cliente sea uno de sus familiares. En dicha norma no existe una excepción que sí lo permita a ciertos empleados.

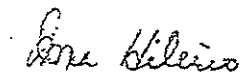
Otro punto que deseo aclarar es sobre el contenido del último párrafo de su carta. Como Gerente de Sucursal que usted ha sido por tantos años, debe tener claro que el vocabulario usado y que cita, es uno acostumbrado en todas estas comunicaciones para reafirmarle al empleado que aún cuando se espera que no ocurran nuevos incidentes; de ocurrir, la institución se reserva el derecho de aplicar las próximas medidas disciplinarias que

correspondan según las faltas en que incurra el empleado. Me sorprende que esto le haya alarmado, cuando usted lleva muchos años supervisando y conoce los procesos.

Por último y no menos importante, nunca hemos dudado del compromiso que usted ha tenido y tiene con la Cooperativa. Solamente le exhortamos a que continúe comprometida con la Cooperativa y con la pureza de los procesos, por el bienestar de todos nuestros socios y que nos ayude en el proceso de cumplimiento con todas las políticas y regulaciones, tanto estatales como federales.

Cualquier duda puede solicitar reunirse conmigo para aclarar la misma. Usted sabe que siempre he estado disponible para hablar sobre esto o cualquier asunto que sea de su interés. La carta que usted suscribió relacionada a este asunto, será archivada en su expediente de personal junto a la comunicación original y con copia de esta carta.

Atentamente,



Sra. Irma Hilerio
Presidenta Ejecutiva

EXHIBIT 22

10 de julio de 2012

Sra. Irma Hilerio Arroyo
Presidenta Ejecutiva

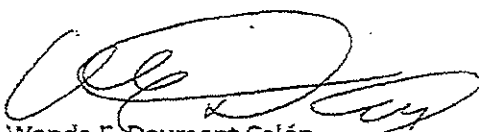
Hago referencia a su comunicación fechada el 27 de junio de 2012. En lo relacionado con la reunión del día 20 de junio de 2012, según mencionado en el tercer párrafo de su carta, ésta fue celebrada con la Srta. Jessybel A. Matos y la Sra. Lourdes Rodríguez. Al nivel de la Presidenta Ejecutiva no se me ofreció la oportunidad de sostener una conversación previa al envío de su carta.

En cuanto a la transacción del cheque número 1537021, mi única intervención fue iniciar el cheque como bueno y conforme a la norma vigente al momento de la transacción. Ésta se realizó en presencia del Supervisor de Cajeros, José Lozada, y fue trabajada por la cajera Joany Torres, o sea, que hubo transparencia en el proceso. La transacción de cambio de cheque, no de depósito, fue clara y dentro de la norma y yo no trabajé ni realicé la transacción. La Política o Manual del Área de Caja, aplicable al momento de atender esta situación, no prohíbe iniciar cheques como buenos y dar fe del carácter y la identificación del socio en transacciones de familiares. Lo que prohíbe es realizar la transacción e indica además, que la transacción tiene que ser trabajada por otra persona.

Considerando lo antes expuesto, si hay alguna practica que suspender sería únicamente la de iniciar un cheque como bueno que traiga un familiar y si esta es su instrucción la tomaré como una nueva norma, no como una violación. En lo sucesivo no iniciaremos los cheques de ningún familiar. Además, en fecha posterior a su carta, se me fue entregado el Manual de Área de Caja que se ha enmendado para prohibir el autorizar cheques para cambio a un familiar. Esto responde a que se me fue entregado el 6 de julio de 2012 cuando su carta tiene fecha de 27 de junio de 2012.

En todo momento, durante los pasados 30 años de servicio en Caguas Coop, he mantenido un ambiente de trabajo confiable, honesto, claro y respetando las políticas establecidas. Durante ese tiempo me he ganado el respeto, admiración y reconocimiento profesional tanto de los Socios, la Gerencia y la Junta de Directores. Las transacciones realizadas bajo mi gerencia han sido auditadas por auditores externos durante más de 30 años y nunca me han hecho señalamientos de falta de integridad o confiabilidad. Siempre he ofrecido y continuaré ofreciendo un excelente servicio al cliente y a Caguas Coop dentro de las normas establecidas.

Lamento esta situación y de echo me sorprende; que se mencione el imponerme medidas disciplinarias pudiendo estar sujeta a medidas que "pudieran llegar hasta el despido" sin ofrecerme la oportunidad de una conversación con usted previa al envío de la carta.



Wanda E. Daumont Colón
Gerente Sucursal Pueblo

C: Expediente de Personal

EXHIBIT 23

ANEJO 4



CAGUAS COOP

¡Mejor Servicio, más beneficios!
10 de marzo de 2015

Sra. Wanda Daumont
Gerente de Sucursal Central
Caguas Coop
Caguas, Puerto Rico

CAGUAS COOP CENTRAL
Ave. José Cevallos Benítez,
Carretera #1 Km 37.5,
Caguas, Puerto Rico
Tel. (787) 286-8500
Fax (787) 258-9550

CAGUAS COOP PUEBLO
Calle Lope Flores,
Esquina Avenida Muñoz Rivera,
Caguas, P.R.
Tel. (787) 746-9395
Fax (787) 744-3620

Estimada Sra. Daumont:

El pasado 20 de febrero de 2015, uno de los cajeros que se encuentran bajo su supervisión, tramitó un desembolso de la línea de crédito del socio [REDACTED] a petición suya. Debido a que el socio mismo no tramitó en persona su solicitud, nuestras normas requieren que un Oficial de la Cooperativa lo haya aprobado. Usted obvió dicho paso, e indicándole al cajero que lo tramitara sin dicha autorización, ya que no había ningún oficial en ese momento en la institución. El socio, a quien se le extendió la línea de crédito resulta ser su esposo.

Al usted instruir a uno de sus supervisados que tramitara el desembolso sin la firma autorizada, requerida en ese caso, usted violentó las siguientes normas de conducta:

"No realizar transacciones, favores o concesiones que estén fuera de las normas que regulan la sana administración a ningún socio, cliente, patrocinador, depositante, proveedor, consultor, etc." (Pág. 5 Código de Normas de Conducta y Disciplina Progresiva)

"Violar o instigar a otros empleados a violar los métodos de operación establecidas, las normas y/o políticas de la Cooperativa o las instrucciones verbales o escritas de la supervisión." (Tabla 4 - Actos constitutivos de Violación contra las Políticas Institucionales)

"Ofrecer información falsa en cualquier solicitud o documento mediante el cual se cree, transfiera, termine o afecte cualquier, derecho, obligación o interés o intencionalmente dar información falsa en cualquier solicitud de crédito, pagaré u otro documento. (Tabla 1: Actos Constitutivos de Violación Contra la Honestidad) Al usted firmar como si fuera su esposo y sin estar autorizada con su firma a hacerlo, usted ofreció información falsa en un documento oficial de la Cooperativa y de gran importancia para mantener la pureza de las transacciones que se realizan en el mundo comercial del cual, como Cooperativa somos parte.

Aún cuando usted no realizó la transacción directamente, indujo a uno de sus subordinados a incumplir con nuestras normas, por lo cual, incumplió con las disposiciones de nuestra Política de Conflicto de Intereses que requieren que:

"El empleado no permitirá que sus intereses personales confluyan, o aparenten confluir con los intereses de la Cooperativa."

"El empleado no participará, efectuará, aprobará o realizará transacción alguna en la Cooperativa, en la cual algún familiar o pariente de cualquier grado de consanguinidad o afinidad, sea parte."

Como consecuencia de este incidente sostuvimos una reunión con usted, en la misma, no solo usted nos informó que acostumbraba a realizar ese tipo de transacción por su esposo, sino, que nos indujo a error al indicarnos que usted era firma autorizada en esa línea de crédito expedida a su esposo. Al revisar el expediente de dicha línea de crédito encontramos que usted no es persona autorizada dentro de esa línea de crédito. También advinimos a conocimiento que usted firmó por su esposo, por lo cual la firma que aparece en el documento, aún cuando tiene el nombre de su esposo, no tiene su firma. Usted falsificó la firma de éste. De la investigación que se ha realizado al momento encontramos que usted firmó Hojas de Desembolso en dicha línea de crédito en 7 ocasiones desde el 10 de julio de 2014 al presente. Con este acto, usted incurrió en la falta grave dispuesta en la Tabla 1 de nuestras Normas de Conducta sobre Actos Constitutivos de Violación Contra la Honestidad, la cual dispone:

"Ofrecer información falsa en cualquier solicitud o documento mediante el cual se cree, transfiera, termine o afecte cualquier, derecho, obligación o interés o intencionalmente dar información falsa en cualquier solicitud de crédito, pagaré u otro documento."

El usted falsificar la firma de su esposo y socio de esta Cooperativa, también constituyó una violación a la Norma de Conducta contenida en la Tabla 7: Actos Constitutivos de Fraude a la Cooperativa, la cual consiste en:

"Alterar, falsificar, ocultar o destruir cualquier cuenta o documento que se relacione con los fondos de la Cooperativa."

Otro acto de violación grave a nuestras Políticas Institucionales cometido por usted de naturaleza grave, fue el cometido el día 30 de enero de 2015, al usted autorizar que una persona que no es firma autorizada en una cuenta corriente comercial realizara un retiro de dicha cuenta por la suma de \$18,795.43.

Los actos aquí mencionados son violaciones crasas a nuestras Políticas Institucionales. La Cooperativa es sumamente celosa con el manejo de las cuentas y haberes de sus socios y clientes. Este celo ayuda y ha ayudado a esta institución a ganarse un símil de respeto dentro de la comunidad cagüense y pueblos limítrofes.

Tanto en nuestro Manual de Empleados, en el Código de Ética, como en el Código de Normas de Conducta y Disciplina Progresiva se establece que la Cooperativa espera que todos sus empleados "observen una conducta adecuada que contribuya a la imagen de excelencia", también se dispone la responsabilidad que tienen todos los empleados de desempeñar sus deberes diligentemente, con

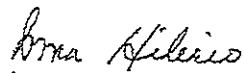
lealtad y eficiencia debida. De forma específica en el Código de Ética se indica que los empleados tienen que desempeñar sus funciones con el más grado de ética, honestidad, integridad e imparcialidad y con la diligencia y atención necesaria.

Aún cuando la cuenta en la cual firmó haciéndose pasar por otra persona, es relacionada con su esposo, no hay justificación alguna para ello, máxime que usted por ocupar una posición de supervisión y gerencia viene llamada a ser ejemplo.

Los actos cometidos por usted son de naturaleza grave y no podemos permitir que los mismos se continúen repitiendo. Por lo cual, luego de un análisis profundo y de evaluar la naturaleza y gravedad de sus faltas, las cuales, según nuestras normas de conducta conllevan el despido en la primera ofensa, damos por terminada su relación de empleo con esta Cooperativa efectivo al día de hoy.

Usted recibirá próximamente la liquidación del balance acumulado, si alguno, por concepto de vacaciones y le estamos entregando la debida comunicación en relación a la Ley COBRA para que pueda, bajo las disposiciones de dicha ley, mantener el plan médico que tiene con la Cooperativa.

Sinceramente,


Irma Hilario
Presidenta Ejecutiva

Cc: Lourdes Rodríguez, VP Finanzas y Recursos Humanos
Ramón Adorno, VP Operaciones

EXHIBIT 24



CAGUAS COOP
Mayor servicio, más bienestar

Código de Normas de Conducta y Disciplina Progresiva Supervisión

Mayo 2013

Tabla 1: Actos Constitutivos de Violación Contra la Honestidad

Ofensa	Primera Infracción	Segunda Infracción	Tercera Infracción	Cuarta Infracción
Ser convicto por cualquier delito que conlleve depravación moral.	Despido			
Ofrecer información falsa en la Solicitud de Empleo o en otro documento de empleo o beneficios oficial de La Cooperativa.	Despido			
Recibir honorarios, regalos, comisiones o prendas de cualquier persona, firma o corporación por conseguir o tratar de conseguir un préstamo o la compra o descuento de cualquier documento, instrumento negociable, pagaré, cheque, giro o letra de cambio de La Cooperativa.	Suspensión de empleo y sueldo por 5 días laborables	Despido		
Recibir cualquier beneficio por la prestación de cualquier servicio que de ordinario prestaría La Cooperativa a la persona si cumple con los requisitos estipulados.	Reprimenda Escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido	
Ofrecer información falsa en cualquier solicitud o documento mediante el cual se cree, transfiera, termine o afecte cualquier derecho, obligación o interés, o intencionalmente dar información falsa en cualquier solicitud de crédito, pagaré, u otro documento.	Despido			
Violación a la Ley de Hostigamiento Sexual, Ley 17 del 22 de abril de 1986, según enmendada, y a la política establecida en la Cooperativa al respecto.	Despido			

Ofensa	Primera Infracción	Segunda Infracción	Tercera Infracción	Cuarta Infracción
Brindar información falsa en cualquier investigación o auditoría, interna o externa, con previo conocimiento de la falsedad.	Despido			
Leer, revisar, fotocopiar, fotografiar o divulgar el contenido de documentos u otra información no relacionada a sus funciones sin previa autorización.	Despido			
Sin autoridad legal, apropiarse de fondos de La Cooperativa, en todo o en parte, para su beneficio o el de otra persona.	Despido			
Sustraer o hacer una aplicación indebida de dinero, fondos o créditos de La Cooperativa o de valores existentes.	Despido			
Apropiarse de forma indebida, desmedida y sin autorización de los medicamentos disponibles en el botiquín de primeros auxilios.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido

Tabla 2: Actos Constitutivos de Violación Contra la Integridad

Ofensa	Primera Infracción	Segunda Infracción	Tercera Infracción	Cuarta Infracción
Falta de cortesía en el trato a compañeros, supervisores, clientes, socios, depositantes, proveedores o visitantes.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido
Juegos de manos, juegos de azar y/o apuestas dentro de los predios de La Cooperativa durante o fuera de horas laborables.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido

Tabla 4: Actos Constitutivos de Violación contra las Política Institucionales

Ofensa	Primera Infracción	Segunda Infracción	Tercera Infracción	Cuarta Infracción
Trabajar deficientemente o no conforme a las normas de calidad y las instrucciones operacionales establecidas por la Cooperativa.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido
Ineficiencia, descuido, negligencia, falta de interés o irresponsabilidad en el desempeño de sus funciones.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido
Violar o instigar a otros empleados a violar los métodos de operación establecidos, las normas y/o políticas de La Cooperativa o las instrucciones verbales o escritas de la supervisión.	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido	
Trabajar tiempo extra sin la debida autorización.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido
Poseer o introducir bebidas alcohólicas a los predios de La Cooperativa sin autorización.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido
Trabajar bajo los efectos de alcohol o drogas.* * Se podrá requerir la participación del empleado en un programa de rehabilitación para el uso de sustancias que alteren el estado mental.	Suspensión de empleo y sueldo por 5 días laborables	Despido		

Ofensa	Primera Infracción	Segunda Infracción	Tercera Infracción	Cuarta Infracción
No mantener una buena apariencia personal, vestimenta adecuada o utilización el uniforme según requerido para su puesto y funciones.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido
Violación a las reglas, prácticas o políticas de salud y seguridad ocupacional.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido
Ausentarse del lugar de trabajo durante horas laborables sin autorización de la supervisión inmediata.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido
Ausentarse del trabajo por tres días consecutivos sin notificación a la supervisión inmediata ni justificación.	Despido			
Fumar en los predios de La Cooperativa, excepto en áreas designadas para ello.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido
Faltar a sus obligaciones financieras con La Cooperativa, incurriendo en atrasos o sobregiros no autorizados.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido
Recibir visitas personales durante horas laborables. Si fuere un caso de emergencia el empleado deberá notificar a la supervisión y solicitar su autorización.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido

Ofensa	Primera Infracción	Segunda Infracción	Tercera Infracción	Cuarta Infracción
Usar el programa de "Internet" y/o cualquier otra red de comunicación para labores no relacionadas con el trabajo sin antes haber recibido la debida autorización.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido
Usar los programas de computadora en las computadoras de La Cooperativa sin una licencia o sin haber recibido la autorización de acuerdo con las prácticas de La Cooperativa.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido
Usar el programa de "Internet" y/o cualquier otra red de comunicación para adquirir programas en violación a las leyes de derecho de autor o para obtener material considerado ofensivo por otros.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido
Rehusarse a cooperar en la investigación de una posible violación a leyes, prácticas o políticas que rigen La Cooperativa.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido
Ausentismo excesivo, por sobre los parámetros establecidos, incluyendo tardanzas.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido

Tabla 6: Actos Constitutivos de Violación a la Integridad Corporal

Ofensa	Primera Infracción	Segunda Infracción	Tercera Infracción	Cuarta Infracción
Provocar o instigar riñas o peleas durante horas laborables en los predios de La Cooperativa o durante actividades oficiales auspiciadas por La Cooperativa.	Despido*			
Agredir físicamente a compañeros de trabajo, clientes, socios, depositantes, proveedores, visitantes, etc. durante horas laborables en los predios de La Cooperativa o durante actividades oficiales auspiciadas por La Cooperativa o reaccionar a una agresión.	Despido*			

*En caso de que haya más de un empleado involucrado todos serán sometidos a la misma acción disciplinaria. Cada caso será evaluado individualmente y en sus meritos para verificar si la agresión fue debido a un acto de defensa propia debido a un temor real a la seguridad o la vida.

Tabla 7: Actos Constitutivos de Fraude a La Cooperativa

Ofensa	Primera Infracción	Segunda Infracción	Tercera Infracción	Cuarta Infracción
Cambiar o convertir los fondos de La Cooperativa bien en efectivo, en papel u otra moneda corriente o instrumento negociable sin autoridad legal para ello.	Despido			
Descuidar, dejar de guardar o desembolsar los fondos de La Cooperativa en violación a lo dispuesto por Ley, en los reglamentos o en las políticas internas.	Despido			

Ofensa	Primera Infracción	Segunda Infracción	Tercera Infracción	Cuarta Infracción
Alterar, falsificar, ocultar o destruir cualquier cuenta o documento que se relacione con los fondos de La Cooperativa.	Despido			
Falsificar o alterar informes o documentos de La Cooperativa o sus clientes, socios o depositantes.	Despido			
Prestar los fondos de La Cooperativa, en todo o en parte, especular con ellos o utilizarlos para cualquier objeto no autorizado por ley o reglamento institucional.	Despido			
Depositar ilegalmente fondos de La Cooperativa, todos o parte de ellos, en alguna cooperativa, banco, o institución financiera, o en poder de otra persona.	Despido			
Llevar alguna cuenta falsa o que haga un asiento falso de fondos de La Cooperativa o que se relacione con los mismos.	Despido			
Ocasionar el desembolso de fondos de La Cooperativa por omisión, descuido o negligencia en violación de las normas prestatarias de La Cooperativa.	Despido			

Ofensa	Primera Infracción	Segunda Infracción	Tercera Infracción	Cuarta Infracción
Emitir o expedir cualquier certificado de depósito, orden o letra de cambio, transferir cualquier pagaré, bono, giro, letra de cambio, aceptar hacer asiento falso en cualquier libro, informe o estado financiero de La Cooperativa sin estar autorizado o con intención de defraudar a cualquier persona natural o jurídica o de engañar al Inspector de Cooperativas, a cualquier entidad que asegure los depósitos de La Cooperativa o a cualquier otro funcionario, ejecutivo o persona nombrada para auditar, examinar o investigar los asuntos de La Cooperativa.	Despido			
Intencionalmente registrar incorrectamente o dejar de registrar su asistencia.	Reprimenda verbal	Reprimenda escrita	Suspensión de empleo y sueldo por 5 días laborables	Despido
Registrar la asistencia de otro empleado.	Reprimenda verbal a ambos	Reprimenda escrita a ambos	Suspensión de empleo y sueldo por 5 días laborables a ambos	Despido a ambos
Registrar falsamente la tarjeta de otro empleado que esté ausente.	Despido a ambos			

EXHIBIT 25



CAGUAS COOP
(Mayor Servicio a los Empleados)

Código de Ética

septiembre 2012

Cuerpos Directivos - Significa la Junta de Directores, comité de crédito, el comité de supervisión, el comité de educación, cualquier comité que desempeñe funciones delegadas por la Junta de Directores y cualquier cuerpo permanente de elección debidamente instituido por ley, reglamento o por el reglamento general de la cooperativa.

Extensión de crédito – Préstamo o refinanciamiento de un préstamo con o sin garantía inmueble o mueble, línea de crédito rotativa o línea de crédito simple, sobregiros, etc.

Unidad familiar – Incluye el cónyuge de un integrante de un cuerpo directivo o de un empleado así como los parientes hasta el segundo grado de afinidad o hasta el cuarto grado de consanguinidad o aquella(s) persona(s) que comparta con éste su residencia legal, sin importar el grado de consanguinidad o afinidad, o cualquier persona, sin importar el grado de consanguinidad o afinidad, cuyos asuntos financieros estén bajo su control legal como tutor, fiduciario, albacea, etc.

Buen padre de familia – Grado de diligencia, cuidado y destreza que demostraría una persona ordinariamente prudente en el manejo de sus negocios personales bajo el estándar de un hombre prudente y razonable y el cuidado requerido en diversos tipos de actividades, industrias o profesiones.

Parte relacionada – Incluye, respecto a todo integrante de un cuerpo directivo, oficial o empleado de La Cooperativa, su cónyuge, integrante de la unidad familiar, cualquier socio y cualquier entidad jurídica en la cual la persona en cuestión mantiene directa o indirectamente algún control o interés.

B. Deber de Diligencia y Cuidado

1. Los cuerpos directivos y oficiales ocupan sus respectivos cargos las veinticuatro (24) horas del día y por ende en todo momento están sujetos a las normas de La Cooperativa y de éste Código.
2. Los cuerpos directivos y oficiales desempeñarán sus deberes diligentemente, con lealtad, fidelidad y eficiencia, bajo el concepto de buen padre de familia, según definido.
3. Todo integrante de un cuerpo directivo, funcionario ejecutivo, oficial o empleado deberá cumplir con la legislación y reglamentación aplicable tanto en el aspecto operacional como en el administrativo.
4. Todo integrante de un cuerpo directivo, oficial o empleado se abstendrá de llevar a cabo actividades o acciones que resulten o creen la apariencia de:
 - a) Que está obteniendo algún beneficio personal de los bienes de La Cooperativa;
 - b) Que está brindando trato preferencial o trato especial no contemplado en la políticas a ciertos socios, clientes, depositantes y/o terceros;

- c) Que está tomando decisiones sin seguir los procedimientos establecidos u obtener la autorización requerida para ello;
 - d) Que afecten la confianza de los socios, clientes, depositantes y/o terceros.
5. Todo integrante de un cuerpo directivo, oficial o empleado cumplirá con los deberes asignados dentro del término requerido.
6. Los integrantes de los cuerpos directivos asistirán a las reuniones que les correspondan con la regularidad y puntualidad que sean citadas. No se ausentarán a las reuniones sin antes proveer una excusa razonable y haber sido debidamente excusados.
7. Todo integrante de un cuerpo directivo, oficial o empleado deberá asistir a los seminarios que le corresponda así como a las actividades patrocinadas por La Cooperativa, a no ser que provea una excusa razonable.
8. Todo integrante de un cuerpo directivo, oficial o empleado tomará las medidas necesarias que garanticen el cumplimiento continuo con la reglamentación aplicable.

Estándar Mínimo de Conducta

Todo integrante de un cuerpo directivo, oficial o empleado observará un alto nivel de comportamiento ético y un estado mental saludable, que le permita llevar a cabo sus labores eficientemente y proyectar una buena imagen de La Cooperativa.

Evitará en todo momento cualquier estado de intoxicación o embriaguez, mientras participe en actividades o reuniones o represente a La Cooperativa en las mismas.

C. Informaciones Lesivas

Todo integrante de un cuerpo directivo, oficial o empleado se expresará positivamente de La Cooperativa con el propósito de preservar el prestigio y la confianza que tienen los socios, clientes y depositantes en la Institución.

Todo integrante de un cuerpo directivo, oficial o empleado se abstendrá de hacer, manifestar o transmitir cualquier rumor, o indicación verbal o escrita que redunde o pueda redundar, directa o indirectamente, en el descrédito o que afecte la solvencia de La Cooperativa o que aconseje, ayude, procure o induzca a otra persona o entidad a que origine, transmita o circule cualquier manifestación o rumor de tal naturaleza.

V. Compensación y Reembolso de Gastos

A. Compensación

Los integrantes de los cuerpos directivos y los de cualquier otro comité debidamente electo, no recibirán compensación o remuneración alguna por el desempeño de sus funciones, excepto el pago de dieta por asistencia a reuniones oficiales según lo establezca el Reglamento para Asuntos de Dieta y Millaje de Cuerpos Directivos de La Cooperativa.

B. Reembolso de gastos razonables

Los integrantes de los cuerpos directivos y los de cualquier otro comité debidamente electo, podrán recibir el reembolso de los gastos razonables en los que incurran en el desempeño de sus funciones de acuerdo al reglamento aprobado por La Cooperativa. Dicho reembolso no incluirá los gastos incurridos por el cónyuge o familiares dentro del segundo grado de afinidad o el cuarto grado de consanguinidad o "parte relacionada" de dichos directores o integrantes de los cuerpos directivos o comités.

El reembolso se efectuará de conformidad con el Reglamento de Reembolso de Gastos que haya adoptado La Cooperativa.

VI. Procedimientos Disciplinarios

A. Violaciones al Código de Ética

Conforme a la Ley 255 del 28 de octubre de 2002 conocida como la Ley de Sociedades Cooperativas de Ahorro y Crédito de 2002, según enmendada, cualquier violación a las normas del Código de Ética constituirá una práctica inadecuada en la administración y operación de La Cooperativa por parte del infractor.

B. Sanciones y penalidades en el caso de oficiales y empleados

1. Cualquier violación a las normas del Código de Ética por parte de un oficial(es) o empleado(s) conllevará la imposición de sanciones y/o acciones disciplinarias que podrán incluir reprimenda verbal, reprimenda escrita, suspensión temporera o permanente del cargo, suspensión de empleo y sueldo o despido dependiendo de la gravedad de la violación y la frecuencia en que se llevó a cabo la misma.

Dependiendo de la violación(es) la sanción y/o acción disciplinaria podrá conllevar referir el asunto a la atención de las agencias reguladoras para la acción administrativa o judicial pertinente. En la imposición de sanciones y/o acciones disciplinarias a oficiales y empleados por violación al Código de Ética se tomará en consideración como agravante o atenuante, según sea el caso, además de la falta cometida, el cargo que ocupa el infractor, el riesgo de pérdida o daño a La Cooperativa y la existencia de faltas anteriores.

EXHIBIT 26



CAGUAS COOP

Tu Centro Financiero.

**MANUAL DE SERVICIOS AL
SOCIO & POLITICA DE
SERVICIOS**

COOPERATIVA DE AHORRO Y CRÉDITO CAGUAS
MANUAL DE SERVICIOS AL SOCIO & POLÍTICA DE SERVICIOS AL SOCIO
PÁGINA 7

del individuo que realiza las transacciones.

- (b) Bajo esta forma de negocio, el individuo continúa siendo personalmente responsable ante reclamaciones entabladas contra su comercio.

2.1.3.2 Documentos Requeridos para Apertura de la Cuenta Comercial:

2.1.3.2.1 Cláusulas de Incorporación:

- (a) Documento acreditativo del registro de la corporación ante el Departamento de Estado.

2.1.3.2.2 Resolución Corporativa:

- (a) Aquella corporación que tenga constituida una Junta Directiva, se le requerirá un acuerdo de los miembros directivos autorizando a las personas que comparecen a la Cooperativa a realizar transacciones, firmar las mismas en representación de la Corporación.

2.1.3.2.3 Patente Municipal:

- (a) Establecimientos comerciales ubicados en el municipio requieren de una patente municipal para operar en esa localidad. La patente tiene que ser extendida al negocio que se opera. Ej "El Colmado del Pueblo" o "El Fogón de Caguas".

2.1.3.2.4 Certificado de Buena Pro

- (a) El Certificado de Buena Pro tiene el propósito de expresar que la entidad ha cumplido con todos los requisitos del Departamento de Estado.

EXHIBIT 27

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

WANDA DAUMONT COLÓN

Plaintiff

V.

COOPERATIVA DE AHORRO Y
CRÉDITO DE CAGUAS

Defendant

CIVIL NO.: 15-3120

AGE DISCRIMINATION

CONTINUATION OF TAKING OF DEPOSITION
OF MRS. WANDA DAUMONT-COLÓN

DATE : January 26, 2017
TIME : 9:20 a.m.
OFFICE : MENDOZA LAW OFFICES
ADDRESS : Centro de Seguros Building, Suite 312
701 Ponce de Leon Avenue
San Juan, Puerto Rico

APPEARANCES

ON BEHALF OF PLAINTIFF:

Erickson Sánchez-Preks, Esq.

ON BEHALF OF DEFENDANT:

Enrique J. Mendoza-Méndez, Esq.
Otto Muller, Esq.

NOTARY PUBLIC:

Otto Muller, Esq.

1 A Mr. José A. Lozada.

2 Q Let's go to Exhibit 4G. And this is a
3 transaction of July the 10th, 2014. Correct?

4 A Correct.

5 Q Who authorized this transaction?

6 A Mr. José A. Lozada.

7 MR. MENDOZA:

8 Can the following document be marked as the next
9 exhibit, please?

10 I'm showing you, and your counsel, what has been done
11 as Exhibit 10. And we're going to go off the record so you
12 have the opportunity to examine it.

13 OFF THE RECORD

14 MR. MENDOZA:

15 Q Very well, can you identify the document that
16 had to be marked as Exhibit 10, please?

17 DEPONENT:

18 A Yes.

19 Q Please, do so.

20 A It is a Code of Conduct or Norms of Conduct and
21 Discipline for Progressive Employees.

22 Q And it is dated?

23 A May 2013.

24 Q Okay. Is it a fact that on the first page, you
25 signed as having received it?

1 A Correct.

2 Q Can you state the date when you signed... the
3 received?

4 A July 29th, 2013.

5 Q And this is an official document from Caguas
6 Coop?

7 A Correct. Yes.

8 Q And it's a document that you know and use in the
9 usual course of business, when you worked at Caguas Coop.

10 A Correct.

11 MR. MENDOZA:

12 Okay. Thank you. Can the following exhibit be marked
13 as the next one in this deposition, please? I'm showing,
14 counsel and deponent, what has been marked as Exhibit 11
15 of this deposition.

16 We're going to go off the record to allow them time
17 to examine it, please.

18 OFF THE RECORD

19 MR. MENDOZA:

20 Q Can you identify what has been marked as Exhibit
21 11 of this deposition?

22 DEPONENT:

23 A We have marked the Employee Manual.

24 Q Of what date?

25 A April 2012.

1 Q On the first page, can you describe what it is?

2 A A receipt request.

3 Q It is signed by you crediting that you received
4 said manual.

5 A Correct.

6 Q And what is the date of your receipt?

7 A May 19th, 2012.

8 Q And this is an official document of Caguas Coop.
9 Correct?

10 A Correct.

11 Q And this is a document that you used to use as
12 part of the usual course of business while you worked at
13 Caguas Coop.

14 A Correct.

15 MR. MENDOZA:

16 Please, let's mark this document as the following
17 exhibit in this deposition. Please.

18 Let me show you what has been marked as Exhibit 12 of
19 this deposition, for examination by you and your counsel.

20 Let's go off the record to do that.

21 OFF THE RECORD

22 MR. MENDOZA:

23 The document that I handed to the court reporter
24 consisted of a certification of receipt and a code of
25 ethic. The certification of receipt is going to be marked

1 as Exhibit 12 and the code of ethic is going to be marked
2 as Exhibit 13 and we will handle them separately.

3 With this clarification, we're going to then show
4 them again to counselor and deponent for examination.
5 Have you examined both documents?

6 MR. SÁNCHEZ:

7 No.

8 MR. MENDOZA:

9 Okay. Are we on record?

10 COURT REPORTER:

11 Yes.

12 MR. MENDOZA:

13 Okay. Let's go off the record to allow them time to
14 examine the document.

15 OFF THE RECORD

16 MR. MENDOZA:

17 Q Please, we're going to work at this moment only
18 with Exhibit 12.

19 DEPONENT:

20 A Correct.

21 Q Can you identify what that document is?

22 A It's a certification.

23 Q And bears what date?

24 A February 2nd, 1996.

25 Q And who signs it?

1 A Myself.

2 Q And what does it certify?

3 A Well, it certifies, for that time, an ethics
4 code. I'd have to look in my files to see what code of
5 ethics, because they change.

6 Q Very well. So, based on that certification, it
7 is fair to conclude that by virtue of that document, you
8 certify having received and having discussed a certain
9 code of ethics in a meeting held on February 2nd, 1996.

10 A Yes. And I reiterate that I would have to look
11 back at my files for the 1996 code of ethics.

12 Q Very well. Can you read out loud the
13 certification for the record, please?

14 A I hereby certify that I received a copy of the
15 code of ethics that was discussed at a meeting held on
16 February 2nd, 1996.

17 Q Okay. Please, tell me yes or no. Do you admit
18 that in a meeting held on February 2nd, 1996, you received
19 a copy of the code of ethics?

20 A For it to be in 1996...

21 Q Please, answer yes or no.

22 A Can you repeat the question?

23 Q Yes. Do you admit that on February 2nd, 1996 you
24 received a copy of a code of ethic? Yes or no?

25 A It's that I don't recall.

1 Q Okay. The signature in this document is yours.
2 Correct?

3 A Correct.

4 Q Do you have any evidence in your possession to
5 challenge that what this document says is false?

6 A If I have any documentation?

7 Q I'll make the question again.

8 A Okay.

9 Q What this document states, is it true or false?

10 A It's true.

11 Q Okay. Thank you. Now, can you explain...? Can
12 you identify to us what has been marked as Exhibit 13.

13 A Code of Ethics.

14 Q And what date it has?

15 A September, 2012.

16 Q Is this a document that you use in the usual
17 course of business while you worked as Caguas Coop, yes or
18 no?

19 A Correct.

20 Q Okay. And this is an official document of Caguas
21 Coop?

22 A Correct.

23 Q Okay. Thank you. Please mark the following
24 exhibit as the next one in this deposition.

25 I'm handing to counsel and deponent what has been

1 marked as Exhibit 14 of this deposition and we're going to
2 go off the record to allow them time to examine it. And
3 please, indicate when you have done so.

4 OFF THE RECORD

5 MR. MENDOZA:

6 Q Please, can you identify what has been marked as
7 Exhibit 14 of this deposition, please?

8 DEPONENT:

9 A Well, it says "Caguas Coop, your financial
10 center" and this is a manual of services and policies for
11 the... policies... manual of services to the member and
12 policies of their services.

13 Q Is this an official document of Caguas Coop?

14 A Correct.

15 Q Is this the document that you used during the
16 usual course of business while you worked with Caguas
17 Coop?

18 A Correct.

19 MR. MENDOZA:

20 Very well. Thank you. Can the following document be
21 marked as the next exhibit, please?

22 I'm going to be handing counsel and deponent what has
23 been marked as Exhibit 15. And we're going to go off the
24 record to allow them time to examine it. And please, tell
25 me when you have done so.

1 COSSEC guides are?

2 A The COSSEC guides?

3 Q Yes.

4 A Yes, with an explanation.

5 Q How these guides were available to you?

6 A When they were... we were informed of them or
7 when we received pamphlets from the cooperative.

8 Q Very well. Let's mark this document as the
9 following Exhibit.

10 Well, we'll be showing counsel and deponent what has
11 been marked as Exhibit 16 of the deposition. And we're
12 going off the record to allow both to examine it.

13 OFF THE RECORD

14 MR. MENDOZA:

15 Q Can you examine what has been marked as
16 Exhibit... Excuse me. Can you identify what has been
17 marked as Exhibit 16 of this deposition?

18 DEPONENT:

19 A The operational policy of the teller area.

20 Q Is this an official document from Caguas Coop?

21 A Correct.

22 Q And what date it has?

23 A Approval date of November 21st, 2011.

24 Q Is this a document that you used in the usual
25 course of business while you worked at Caguas Coop?

1 A Correct.

2 Q Okay. Very well. Thank you. Let's mark the
3 following document as the next Exhibit in this deposition.
4 We are handing it to counsel and deponent and going off
5 the record to allow them time to examine it.

6 OFF THE RECORD

7 MR. MENDOZA:

8 Q Can you identify what has been marked as Exhibit
9 17 of this deposition?

10 DEPONENT:

11 A Teller area operations policy.

12 Q Can you state the date of it?

13 A This one was approved June 20th, 2012.

14 Q Is this an official document of Caguas Coop?

15 A Correct.

16 Q Is this a document that you used in the usual
17 course of business while you worked at Caguas Coop?

18 A Correct.

19 Q And the last page is your certification of
20 having received it. Correct?

21 A Correct.

22 Q Okay. Thank you. Let's mark this document as the
23 next Exhibit.

24 We are handing to counselor and deponent what has
25 been marked as Exhibit 18 of this deposition. And we're

1 going off the record to allow them time to examine it.

2 OFF THE RECORD

3 MR. MENDOZA:

4 Q Can you identify what has been marked as Exhibit
5 18 of this deposition?

6 DEPONENT:

7 A Teller area operation policy.

8 Q Can you tell me the date it has?

9 A Approval date, September 4th, 2013.

10 Q And this is an official document of Caguas Coop.

11 A Correct.

12 Q And this is a document that you used to use as
13 part of your functions while you worked at Caguas Coop.

14 A Correct.

15 MR. MENDOZA:

16 Okay. Thank you. You may mark the following three
17 documents in the next consecutive exhibits of this
18 deposition. They'll be Exhibit 19, Exhibit 20, and Exhibit
19 21. And we're going to be handing them to counselor and
20 deponent for examination off the record. Let's go off the
21 record.

22 OFF THE RECORD

23 MR. MENDOZA:

24 Q Can you please identify Exhibit 19 of this
25 deposition?